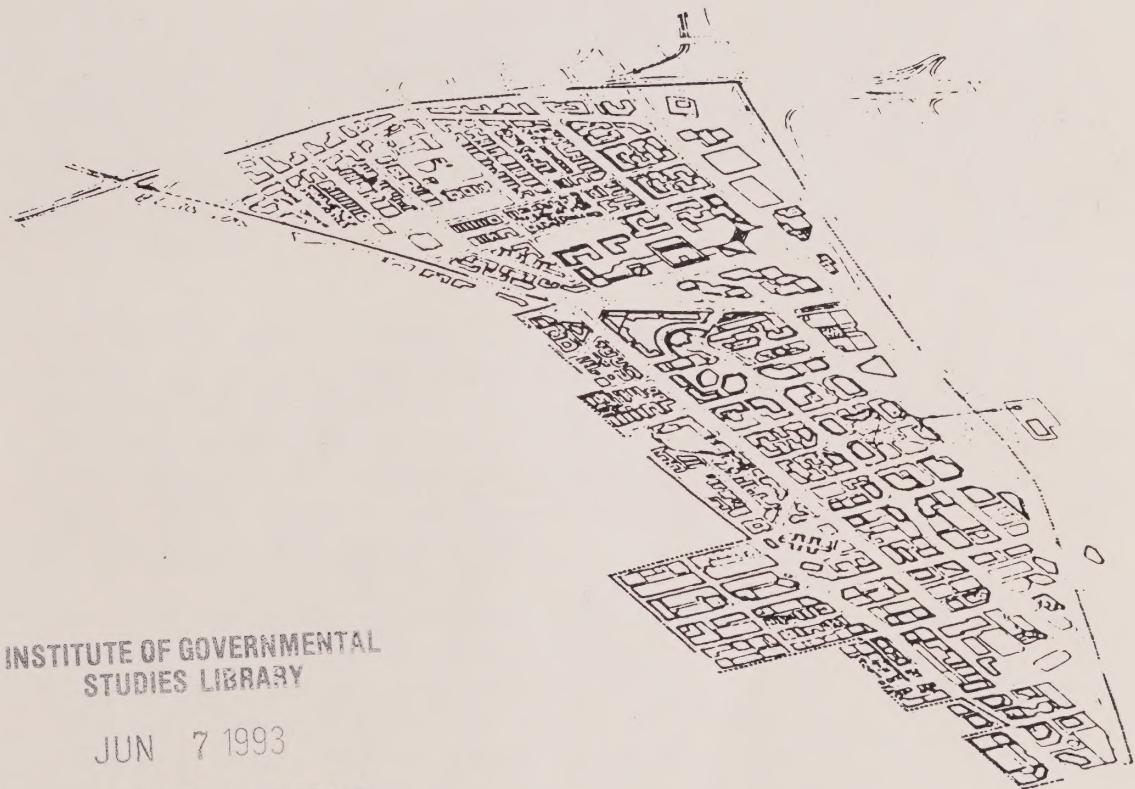


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City of Los Angeles

CENTRAL CITY WEST SPECIFIC PLAN Final Environmental Impact Report



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Los Angeles City Planning Department

Room 505 City Hall, 200 North Spring St, Los Angeles, CA 90012

Community Plan Areas: Westlake, Silver Lake-Echo Park
Council Districts: (1) Gloria Molina, (9) Gilbert Lindsay

CENTRAL CITY WEST SPECIFIC PLAN

City EIR Number CPC 87-182

State Clearing House Number 88-110904

FINAL ENVIRONMENTAL IMPACT REPORT

This document comprises the second and final part of the Environmental Impact Report (EIR) for the project. The Draft EIR, previously circulated for public review and comment, comprises the first part, and is available for review in City Hall Room 505.

Project: The Specific Plan will result in *revised* entitlements and a future land use forecast of about 25 million square feet and 12,000 dwelling units total in the year 2010, or 35 million square feet and 14,500 dwelling units at build-out; will program transportation system and access improvements; and will seek to improve the balance between jobs and housing in the study area. Urban design guidelines and historic resource protection requirements will provide additional direction for proposed development.

The City's intent in formulating a Specific Plan is to link and phase development limits and infrastructure improvements with existing and future carrying capacity of the study area - southwest of the Hollywood and Harbor Freeways. The 465 gross acre Specific Plan area currently includes about 8.5 million square feet of non-residential space and 4,313 dwelling units. Build-out of *existing* zoning and General Plan designations would bring these totals to about 42 million square feet and 8,000 dwelling units, respectively.

Applicant:

City of Los Angeles
DEPARTMENT OF CITY PLANNING
Attention: Daniel P. O'Donnell, Project Coordinator
City Hall, Room 505, 200 North Spring Street
Los Angeles, California 90012-4801

Prepared by:

Neighborhood Planning Division
Department of City Planning

May 1990

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I. SUMMARY

A. PROJECT BACKGROUND

Preparation of a Central City West Specific Plan was recommended by the Westlake Community Plan in 1974. In February 1987, the City Council called for preparation of a specific plan for Central City West. In May 1987, the City Planning Commission recommended that the Westlake Community Plan require that, until a specific plan is adopted for the area, a project approval process be established to necessitate discretionary review of any proposed project. The public reviewed the proposed Central City West Specific Plan in June-November 1989.¹

CEQA Process. This document comprises the finalizing amendment to the Environmental Impact Report (EIR) regarding the Central City West Specific Plan together with the associated implementing Amendments to the Westlake and Silver Lake - Echo Park Community Plans, and the Central City West Specific Plan Ordinance. The Specific Plan comprises a policy framework for the regulation of future land use development and transportation management throughout the plan area. As such, the Plan provides generalized development standards and regulations for all properties within the Plan area. However, the Plan does not propose any specific development project on any specific property. Accordingly, the EIR has been prepared as a Program EIR in which the degree of analytical specificity has been focused to correspond with the policy/regulatory specificity provided by the Plan.

Subsequent Use of the EIR. As a Program EIR, following certification of the EIR and upon adoption of the Plan, this document is intended to serve as the basis of Initial Study determinations for subsequent specific development proposals and related actions. Some subsequent proposals/actions which are clearly within the scope of the Plan may be determined to have been within the scope of this Program EIR. However, future Initial Studies for such proposals/actions may also determine that supplemental environmental review would be necessary to account for project-level specificity or project features which depart from the provisions of the Plan. In these latter cases, such specific development proposals would be the subjects of project-specific EIRs.

Organization of this Document. This document comprises a finalizing amendment to the EIR regarding the Central City West Specific Plan. As such, this document presents a condensed project description and summary of impacts and alternatives analyzed in Section I, a listing of changes to the Draft EIR in Section II, responses to public comments on the Draft EIR in Section III, a listing of persons *not* responding to the Draft EIR in Section IV, and a mitigation monitoring program in Section V.

¹ City of Los Angeles. *Central City West Specific Plan.* Revised Preliminary, Prepared by Meyer & Allen Associates. November 2, 1989.

B. PROJECT DESCRIPTION

LOCATION AND BOUNDARIES

The Specific Plan area is located immediately west of the Los Angeles Central Business District proper, as shown in Figure S-1, comprising some 465 acres bounded generally by the Hollywood Freeway (US-101) on the north, the Harbor Freeway (SR-110) on the east, Olympic Boulevard on the south, and on the west by Glendale Boulevard and Union Avenue. To facilitate the assessment of impacts on surrounding areas, and to provide for analysis of cumulative impacts, a secondary study area, bounded generally by Hoover Street on the west, Sunset Boulevard on the north, Alameda Street on the east and the Santa Monica Freeway (I-10) on the south was utilized, as depicted in Figure S-2. Figure S-3 presents plan area neighborhoods.

STATEMENT OF OBJECTIVES

The City's intent in formulating a Specific Plan is to link and phase development limits and infrastructure improvements with existing and future carrying capacity of the study area. The Specific Plan has been developed to express the vision of an urban village:² a round-the-clock community served by and supporting discernable neighborhoods, which comprise a logical outgrowth of the Los Angeles Central Business District, and which are made feasible by transportation and access improvements.

PROJECT CHARACTERISTICS

The Specific Plan, Specific Plan Ordinance, and Community Plan Amendments would result in a *revised* set of entitlements and a future land use forecast of about 25 million square feet and 12,000 dwelling units total in the year 2010, or 35 million square feet and 14,500 dwelling units at build-out; will program transportation system and access improvements; and will seek to improve the balance between jobs and housing in the study area. Urban design guidelines and historic resource protection requirements will provide additional direction for proposed development.

The 465 gross acre Specific Plan area currently includes about 8.5 million square feet of non-residential space and 4,313 dwelling units. Build-out of *existing* zoning and General Plan designations would bring these totals to about 42 million square feet of non-residential space and 8,000 dwelling units, respectively.

² City of Los Angeles. *Central City West Plan Vision Statement - Work Program*. Adopted by City Council, June 9, 1987.





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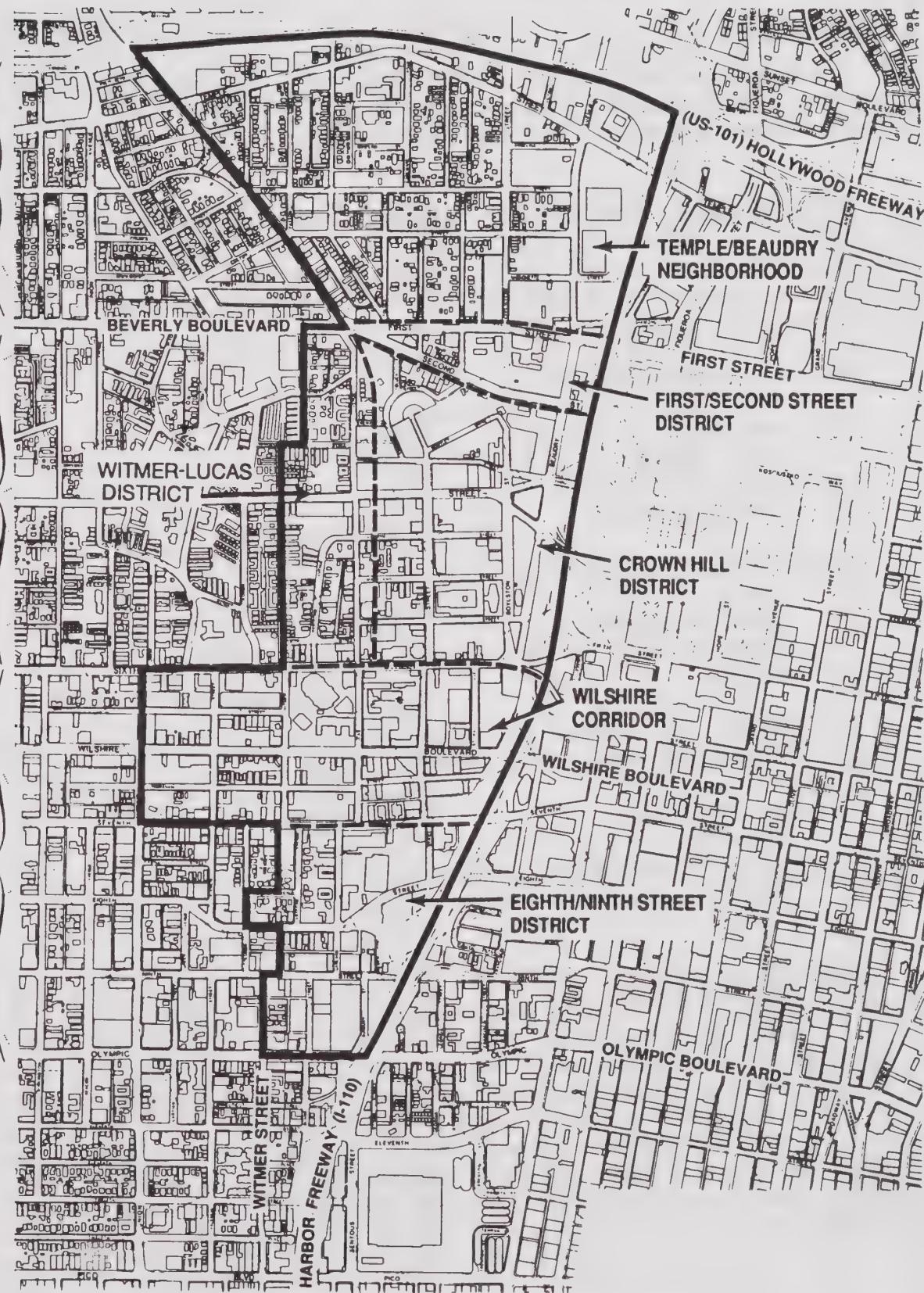
- SPECIFIC PLAN BOUNDARY (STUDY AREA I)
- - - CUMULATIVE ANALYSIS BOUNDARY (STUDY AREA II)

Figure S-2
PROJECT AREA LOCALE

NORTH SUBAREA

CENTRAL SUBAREA

SOUTH SUBAREA



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- SPECIFIC PLAN BOUNDARY
- - - DISTRICT/NEIGHBORHOOD BOUNDARY

Figure S-3
SPECIFIC PLAN AREA
AND SUBAREAS

I. Summary

The components and implications of the Specific Plan are discussed below in terms of area-wide policy elements, transportation programs and implementation mechanisms. Neighborhood-specific elements are detailed in DEIR Section II.C.

Policy Elements, Transportation Programs and Implementation Mechanisms.

The Specific Plan incorporates the results of technical work products and public participation processes into two structures described below: (1) policies, and (2) implementation mechanisms. The Specific Plan organizes functional policies for development of CCW into the following elements:

Land Use Functional Policies:

- Land Use and Zoning Designations
- Housing
- Urban Design
- Parks and Open Space
- Historic Resources

Transportation Functional Policies:

- Transit
- Streets and Highways
- Transportation Demand Management
- Parking.

The Specific Plan details the following implementation mechanisms towards achieving the functional policies outlined above:

Implementation Mechanisms:

- Financing
- Monitoring Mechanisms and Phasing
- Plan Management Organizational Structure.

Land Use and Zoning. The revised zoning map for the Central City West area presented in Figure S-4 reflects a general reduction in entitlements from a potential buildup of some 42 million square feet (MSF) of commercial space to a 35 MSF envelope, however, development would be monitored to ensure that within this envelope only 25 MSF of space could be developed without further discretionary review of plan success. Resultant land use intensities are presented in Table S-1. Distribution of commercial space among office, retail and hotel, as well as the breakdown of the various institutional use types is based on market information; only the total entitlement of commercial space is set under the plan, and the other numbers are presented for informational purposes.

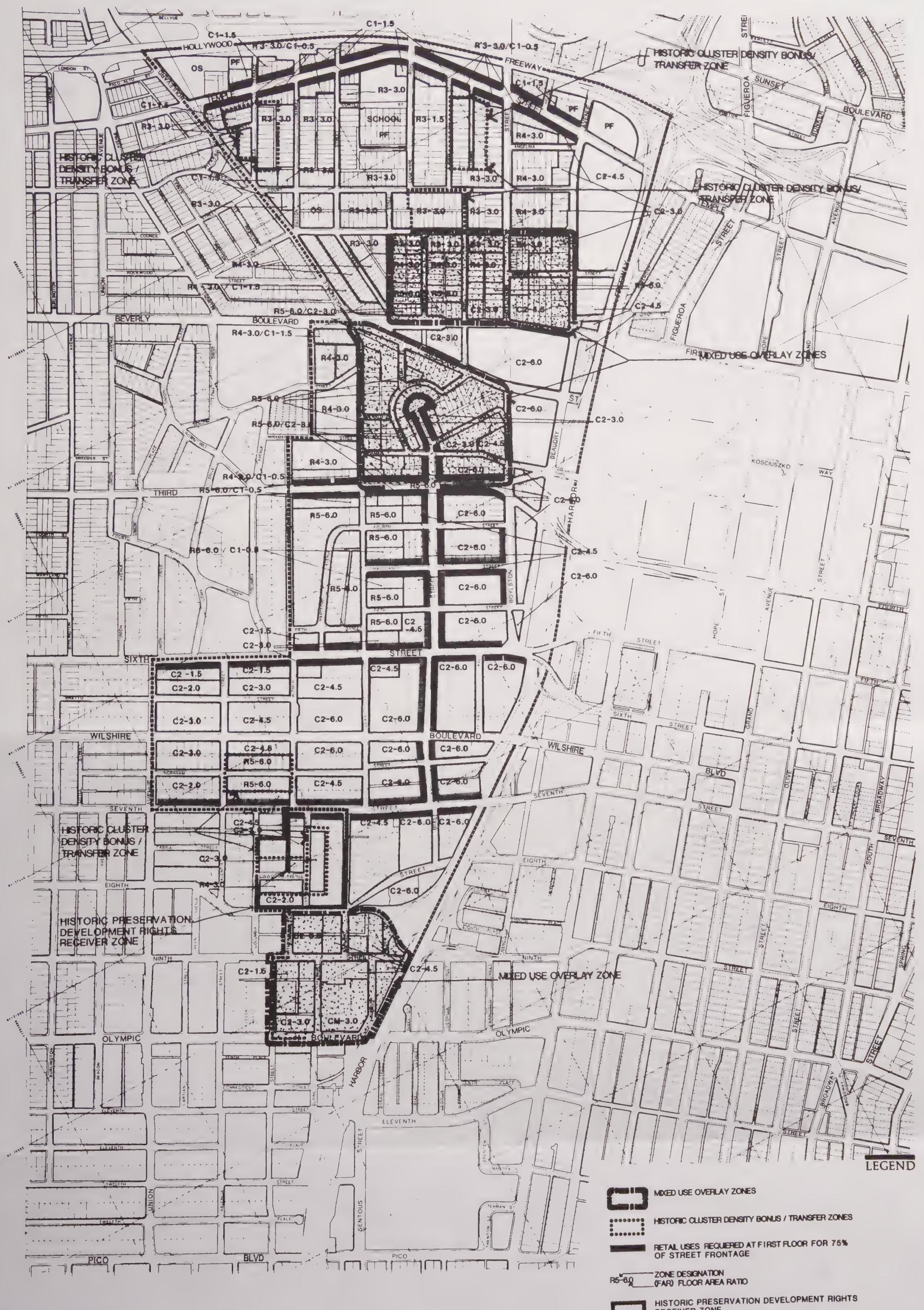


Figure S-4
PROPOSED ZONING



Table S-1
CENTRAL CITY WEST LAND USE SCENARIOS *
 (thousands of square feet, and dwelling units) | | | | | |

<u>Land Use</u>	<u>1988 Existing</u>	<u>Buildout Com Plan</u>	<u>2010 Com Plan</u>	<u>Buildout Spec Plan</u>	<u>2010 Spec Plan</u>
Commercial	6,030	40,291	14,748	35,364	24,648
Office	5,184	35,353	12,940	30,657	21,368
Retail	527	1,602	586	1,438	1,002
Hotel	319	3,337	1,221	3,268	2,278
Industrial	436	1,428	523	510	356
Institutional	1,992	1,992	1,992	1,992	1,992
Medical	1,241	1,241	1,241	1,241	1,241
Government	412	412	412	412	412
Schools/Libraries	219	219	219	219	219
Other Uses	120	120	120	120	120
Total Non-Residential	8,457	43,712	17,263	37,866	26,996
Residential (Units)	4,300	8,050	4,000	14,450	11,900

* Although the Specific Plan revises zoning entitlements to reflect total non-residential buildout entitlements (Specific Plan Envelope) of 35,874,200 square feet and a Specific Plan Cap of 25,000,000 square feet, the higher numbers cited in this table were used in the assessment of impacts throughout the environmental analyses of this EIR. These numbers incorporate existing institutional uses in addition to planned entitlements, to reflect the uncertainties inherent in institutional development and to ensure a conservative analysis of impacts.

Source: Planning Consultants Research, based on Meyer & Allen Associates, 1989.

Under the Specific Plan 25 MSF cap scenario, relative to existing levels, office space would quadruple, retail space would double, hotel rooms would septuple, and residential units would less-than-triple. Industrial space would decline somewhat, as some parcels are replaced with commercial space. Information is not available regarding changes in institutional uses, so these are assumed constant at existing levels (though government, hospital and school uses are anticipated to expand in the area). However, the Specific Plan represents a downzoning of development entitlements relative to the Community Plan, as the two Buildout scenarios are compared in Table S-1.

I. Summary

Zoning, as proposed by the Specific Plan, would transform existing zoning designations in order to strengthen residential or commercial areas, or to correct existing conflicts between adjacent land use or zoning designations. Overall, the locational distribution (north-south gradients of density and use) of zoning designations under the Specific Plan would not substantially change from existing conditions. Three Mixed Use Overlay Zones are proposed by the Specific Plan, one each in the Temple-Beaudry Neighborhood, the Crown Hill District and the Eighth/Ninth Street District. The purpose of these Overlay Zones is to provide transition areas within commercial and residential areas.

Housing. The Specific Plan would revise entitlements to allow for the total development of some 14,500 dwelling units in the plan area, compared to some 4,300 existing dwelling units and 8,000 residential unit entitlements under the current Community Plan. The Specific Plan would require that housing removed be replaced, and that, relative to the 10,200 units of net allowable growth, 5,300 affordable residential units be provided through subsidized construction and/or in lieu fees paid to a Housing Development Corporation (described under Implementation, below). Such units would be priced for accessibility to low and very-low income households.

Urban Design. To reinforce the land uses established for each plan district, the land use relationships between districts, surrounding residential neighborhoods commercial districts, and to reinforce the urban fabric established by the Specific Plan, the Urban Design Element proposes that residential neighborhoods be protected from shade/shadow impacts of buildings, that there be a transition of height from commercial areas into residential areas for compatibility, and that commercial areas within the Specific Plan be compatible with the height of development of the adjacent downtown Los Angeles area.

Adjacent to every R3 (36-54 units/acre), R4 (54-108 u/a) and R'3 (43-74 u/a) zoned area (within or outside the Plan area but not including R4 zoned lots within Mixed Use Zones) there shall be a building height transition zone, within which buildings on C or M zoned lots shall not exceed specified height limits (detailed in Section IV.B.1 of the Draft EIR).

The Urban Design Element of the Specific Plan additionally includes landscape, open space and streetscape guidelines, with provisions regarding setbacks, stepbacks, building height limitations, parking, pedestrian and transit access guidelines, which are summarized on a neighborhood-by-neighborhood basis in the Draft EIR.

Parks and Open Space. The Specific Plan identifies the needs and mechanisms for development of additional open space and recreational facilities in the plan area. Improvements include the following: maintenance and upgrading of the existing Echo Park Tennis Courts; development of some 4 acres of park space in the Temple Beaudry neighborhood; development of a minimum 2-acre park in the Temple-Beaudry Mixed Use Zone; establishment of a minimum 1.75-acre park in the First-Second Street District;

I. Summary

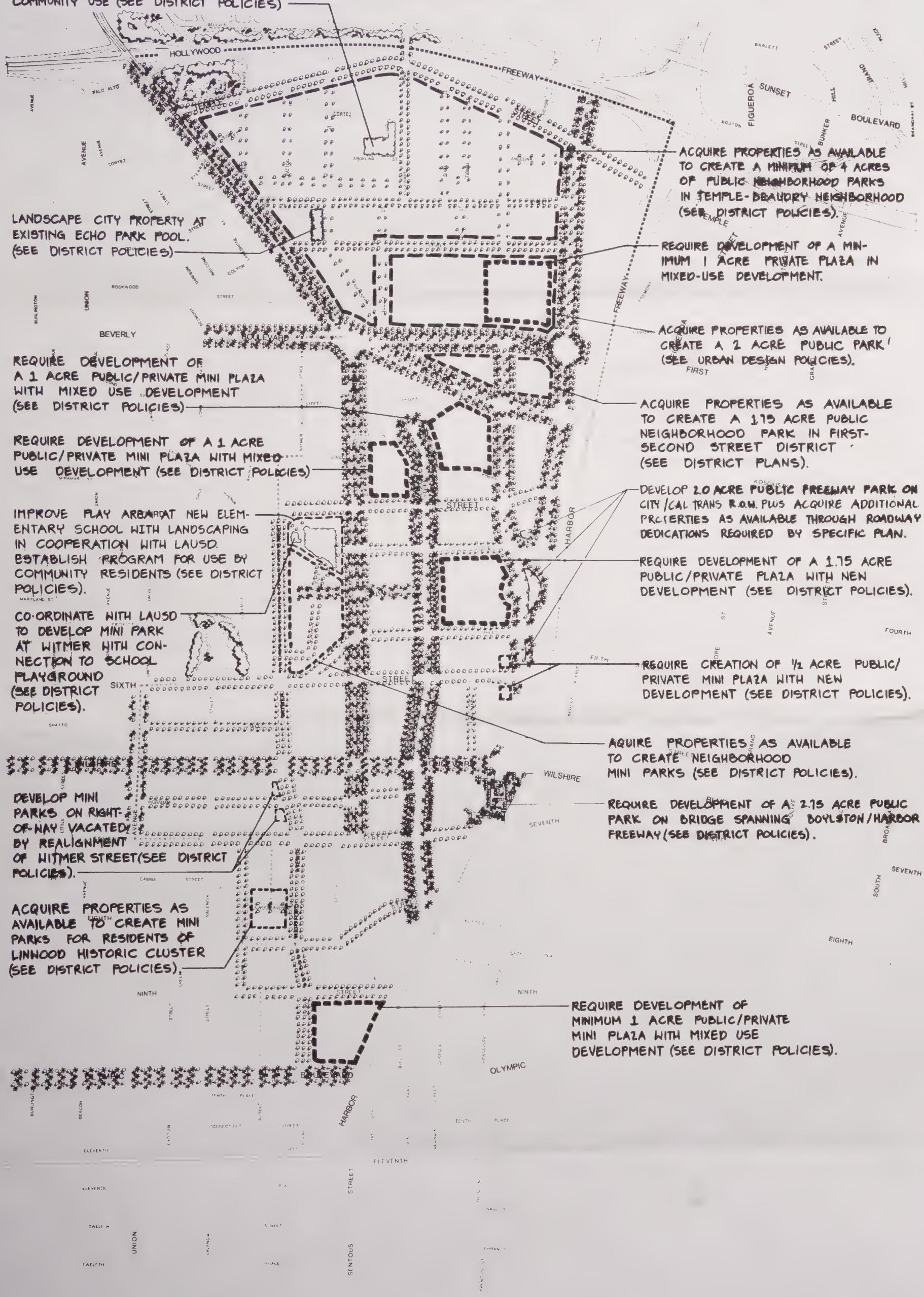
formation of mini parks (minimum 5,000 square feet each) in the Temple-Beaudry Neighborhood, in historic cluster areas, and in the Lucas-Witmer District; construction of a deck over the Harbor Freeway, which would include park and pedestrian facilities connecting CCW and the CBD. Park and Open Space proposals are shown schematically in Figure S-5. Specific Plan provisions for expansion of school facilities, landscaped streets, private commercial open space, and private residential open space to supplement parks and open space resources, as discussed in Section IV.G.3 and IV.G.4 of the Draft EIR.

Historic Resources. The Specific Plan includes provisions for the protection of historic structures identified in the Historic Resources Element through density incentives and historic resource transfer and receiver zones, as discussed in Section IV.O.3 of the Draft EIR.

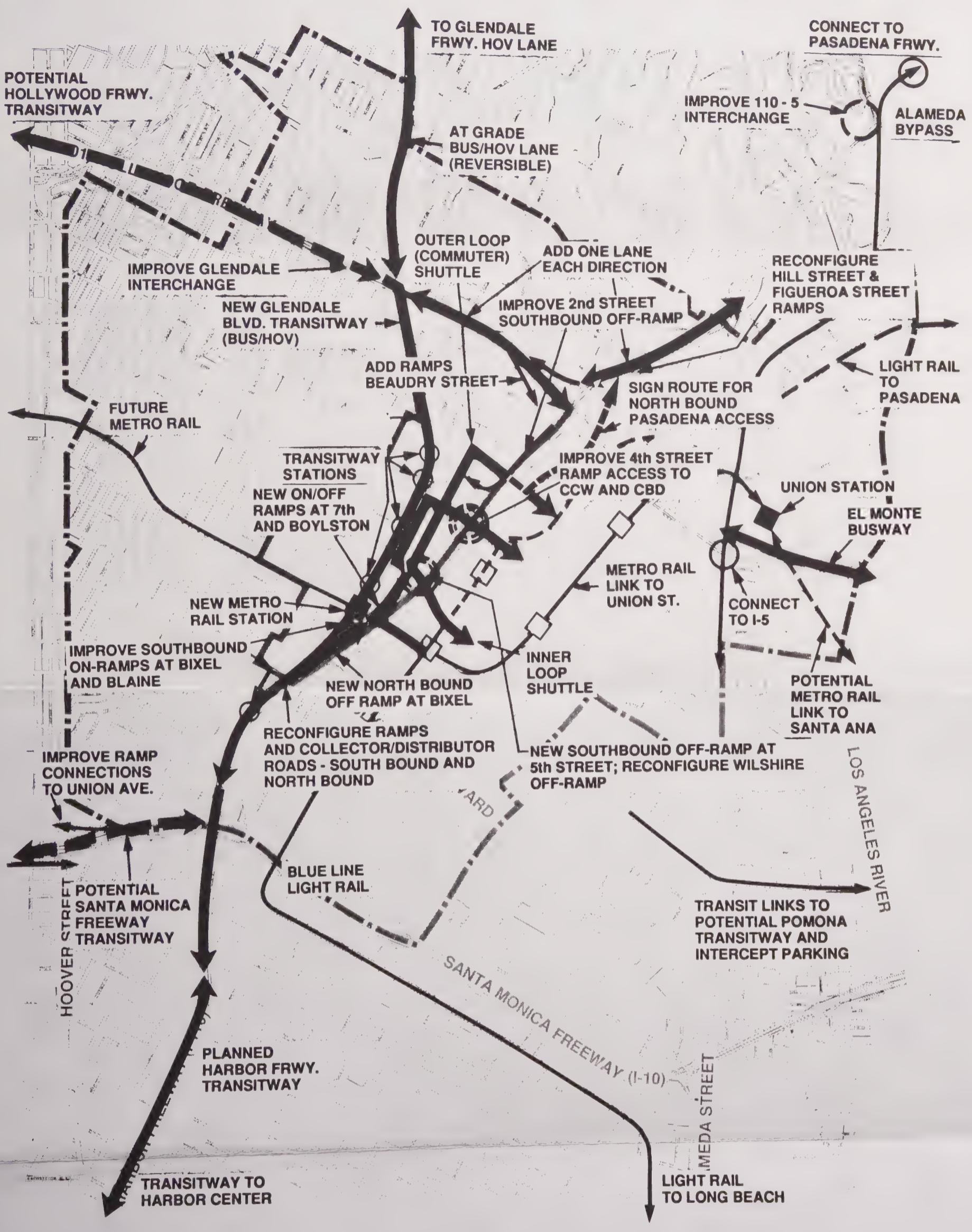
Transportation and Access. The Specific Plan includes an integrated package of development of freeway and street improvements, transit and TDM facilities and programs, and revised parking requirements to complement the land use program presented above. A key component of the Transportation Specific Plan is a comprehensive plan for providing regional transit access to Central City West. The TSP provides major linkages to existing and proposed rail transit facilities serving central Los Angeles, as well as the opportunity to significantly improve bus transit access to both the CBD and Central City West. The following program of \$311 million in transit improvements are proposed for the CCW transit access plan. They are also shown in Figures S-6 and S-7.

- ***MetroRail Station.*** A new Metro Rail station is proposed at Bixel and Seventh, to provide a direct connection for CCW to the Metro Rail (Red Line) subway system. This will provide high capacity rail transit access to the Wilshire corridor, Hollywood, the San Fernando Valley, and ultimately the Santa Ana corridor. It will also provide an important linkage to the various commuter transportation facilities planned at Union Station, including peripheral parking, commuter rail, and the El Monte Busway extension. The Metro Rail tunnel has been constructed at a uniform grade of one percent between the Seventh Street/Flower Street Station in the CBD and the Alvarado Street Station. Therefore, a station can be added to the system just as easily at Bixel Street as at Witmer Avenue, where one had previously been considered. While the platforms would be beneath Seventh Street, the plan proposes escalator connections to the station portal at Bixel and Wilshire, that would also serve the bus transit mall. This will provide a multi-modal transit and transfer station in Central City West. Vertical transportation will also be provided for access from Seventh Street. These elevators will be incorporated into the design of private developments along Seventh Street so that fare collection equipment can be located on Seventh Street as well as up at Wilshire Boulevard. The precise number and location of Metro Rail access points on Seventh Street will be finalized during the Site Plan Review process for developments on Seventh Street. It would be desirable to have multiple access points along Seventh Street connected via an underground mezzanine level on which the fare collection equipment would be located.
- ***Light Rail.*** The planned light rail line (Blue Line from Long Beach to downtown, with extension to Pasadena) will not connect directly into CCW. However, a pedestrian or automated linkage from Boylston/Maryland in CCW to the Union Bank Plaza will provide a direct and short connection to the planned 4th St/Flower station. The proposed CCW shuttle service will also connect to both the 4th/Flower and 7th/Flower rail stations.

IMPROVE EXISTING PARKING LOT AT BETTY PLASENCIA SCHOOL (IF NOT CONVERTED TO MIDDLE SCHOOL) IN CO-OPERATION WITH LAUSD AS PLAY AREA/NEIGHBORHOOD PARK. ESTABLISH PROGRAM FOR COMMUNITY USE (SEE DISTRICT POLICIES)







LEGEND:



MAIN LINE FREEWAY IMPROVEMENTS



10 of 10

Source: DKS and Maver & Allan Associates, 1989

I. Summary

- **HOV/Busways.** A major proposal of the TSP is to provide HOV/Busway facilities that will connect planned and proposed regional facilities directly into CCW, and also significantly enhance bus and HOV access to the CBD.

Glendale Boulevard HOV/Busway. An elevated HOV/Busway is proposed along the median of Glendale Boulevard from the Hollywood Freeway, south to First Street/Beverly Boulevard, then onto Crown Hill and into the Bixel Street corridor. This facility could accommodate a future connection to a Hollywood Freeway HOV/Busway. North of the Hollywood Freeway, dedicated surface HOV lanes are proposed to link to planned HOV lanes on the Glendale Freeway. Along Glendale Boulevard these lanes could be provided either along the curb (through peak hour parking restrictions), or by a reversible median lane. The TSP does not propose extension of the elevated transitway, nor widening of Glendale Boulevard north of the Hollywood Freeway. The orientation to transit and rideshare in the Glendale Boulevard corridor is recommended to avoid traffic impacts on the adjacent communities.

Harbor Freeway Transitway. An extension of the Harbor Freeway Transitway from its planned terminus at 23rd St, is proposed northwards through the Santa Monica Freeway interchange along the Harbor Freeway and into CCW via Bixel Street. It would be largely on elevated structure, but would pass under the Santa Monica Freeway. This facility will provide direct access to the core of CCW, improve transit and rideshare access to the CBD, and enable linkage of CCW to the peripheral parking areas planned for the Convention Center area. It will also provide a direct connection from CCW/CBD to a potential future HOV/Busway on the Santa Monica Freeway.

- **The Bixel Street Transit Mall.** The two HOV/Busway extensions will be connected through the center of CCW by the Bixel Street Transit Mall. This at-grade bus center will extend from Crown Hill (connecting to the elevated Glendale Busway) to midway between Wilshire and Sixth (connecting to the Harbor Transitway).

Development of the triangular parcel bounded by Lucas, Second and Emerald should be conditioned to incorporate into the development plan, and/or dedicate appropriate air rights for, the elevated transitway and access ramps to/from Emerald Street and possibly to ground level to facilitate access to the currently unused Pacific Electric Tunnel.

Both the Glendale and Harbor HOV/Busways will also allow rideshare vehicles and buses to access the local roadway system to reach destinations in either the CBD or CCW. These HOV/Busways will provide preferential access for bus and rideshare vehicles directly into the heart of the central areas. By providing dedicated facilities and access advantages, they provide significant incentives for commuters to use alternatives to the single occupant automobile. As well as providing dedicated facilities for commuter and express bus service, they also provide improved access routes for local bus service as it approaches the congested central area, and access routes for shuttle bus service to outlying intercept and peripheral parking facilities, as such programs develop.

- **Shuttle System Connections.** While oriented towards local internal circulation, shuttle systems will also provide a key element of the regional access strategy. At least initially, these shuttle systems are envisaged to be bus based, although future development of people mover systems or Automated Transit Systems would be possible.

Outer (Commuter) Loop. An outer shuttle loop is proposed, oriented primarily to commuters. Within CCW it would run along Boylston Street which will be the primary corporate address, and will thus provide the best access to most office workers. Proposed access/egress routes into the CBD are on First Street and Seventh Street. The exact routes within the CBD will have to be determined by others, although it is anticipated that these shuttles should at least serve the CRA peripheral parking areas, Union Station, Civic Center, Metro Rail and Light Rail stations. This outer shuttle loop could be extended as necessary. It could for example run to intercept parking facilities at the East LA

I. Summary

Interchange (perhaps along 7th St), or via the HOV/Busways to intercept parking locations, for example at the end of the Glendale Freeway or at Vermont on the Hollywood Freeway.

Inner (local) Loop. An local shuttle loop is also proposed to connect the various facilities in CCW and the CBD. This loop would run down the retail spine of CCW, Bixel Street, and cross to the CBD at Third and Sixth Streets. Again the exact routes in the CBD will need to be determined by others, but destinations should include the rail stations, the 7th St Retail District, and Bunker Hill.

- *Pedestrian Connection.* The Transportation Specific Plan proposes an automated pedestrian connection across the Harbor Freeway linking the CCW area to the CBD. The proposed location for this pedestrian connection is from the Maryland Pedestrian Walk to the Plaza level of the Union Bank Building on the east side of the freeway. Such a connection will tie the pedestrian walkway system in CCW to the pedway system in the CBD. The precise design of the automated pedestrian connection has been left unspecified pending more detailed studies. In the cost estimates for the TSP, a pedestrian walkway of 20 feet in width has been assumed for cost estimating purposes.

Freeway and Street Improvements. The following program of \$149.3 million in freeway improvements is proposed in the Specific Plan, and as such, comprises mitigation for the land use development allowed under the Specific Plan (see Figures S-6 and S-7):

Recommended for implementation commensurate with development to 6.25 million square feet (Phase 1):

- Glendale Boulevard/US-101 interchange redesign,
- Beaudry Avenue/US-101 interchange and connection to Pasadena Fwy connector,
- US-101 mainline widening,
- Hoover-Union/I-10.

Recommended for implementation commensurate with development to 12.5 million square feet (Phase 2):

- Second Street/I-110 ramp,
- Fourth Street/I-110 bridge and associated ramp improvements,
- Fifth Street/I-110 off-ramp,
- Eighth/Ninth Street/I-110 on/off-ramps.

Recommended for implementation commensurate with development to 18.75 million square feet (Phase 3):

- Seventh Street/I-110 on/off-ramps and completion of Boylston Extension to Seventh Street,
- Reconstruction of Fifth Street and Sixth Street bridges across I-110,
- Redesign of northbound collector-distributor roads between 11th Street and Eighth Street on I-110.

Recommended for implementation commensurate with development to 25 million square feet (Phase 4):

- Eighth Street/I-110 NB off-ramp,
- Blaine Street on-ramp improvements to I-110,

I. Summary

- Freeway on-ramps from Fourth Street (SB on) and Sixth Street (NB on) to I-110 shown as optional in the Specific Plan.

In addition, the Specific Plan includes a program of \$99.3 million in local street and arterial improvements and \$53.3 million in acquisitions of right-of-way, designed to complement the proposed land use program. Such improvements include installation of a network Automated Traffic Surveillance and Control (ATSAC) at 54 intersections in the project area, reconstruction of the intersection of Glendale/Beverly/1st/2nd, and widenings and cul-de-sacs in select locations.

Transportation Demand Management Program. While one would normally expect travel demand (trip generation and vehicle-miles traveled) to increase proportionately with land use growth, the proposed plan incorporates several mechanisms to manage transportation demand through the coordination of transit improvements and parking limitations with development, implementation and monitoring of employer TDM plans. Effective implementation of such programs would include the following components:

- requirement of high-occupancy vehicle (HOV) modes, such as carpool, vanpool, bus and rail transit, over single-occupant vehicle (SOV) travel, to reduce SOV mode split from a current level of 75% to a future level of 45%;
- reduction of allowable parking to further limit SOV travel into CCW;
- development of rail rapid transit access into the heart of CCW;
- improved job/housing balance to further reduce regional travel demand;
- shifting of pm-peak hour trips out of the peak period through alternative work schedules at CCW establishments, which is expected to reduce pm-peak hour trip generation by some 10%; and
- penalties for non-compliance equal to triple the \$16,500/trip developer fees.

Revised Parking Requirements. The Specific Plan would transform existing City minimum requirements of parking supply for commercial uses to a set of parking limitations (maximum allowable parking provision rates) phased commensurate with success of TDM measures discussed above.

Implementation Structure. A Specific Plan Ordinance will implement the Zoning Map and other appropriate standards and regulations developed from this Plan narrative, such as the Housing Element and Implementation Plan.

General Plan Amendments to the Westlake and Silver Lake-Echo Park Community Plans will incorporate the Planned Land Use Map. The Specific Plan contains numerous

I. Summary

policies which are applicable to both functional areas (e.g., land use, transportation, housing, etc.) and District Policies (e.g., Temple-Beaudry Neighborhood policies, Crown Hill District policies, etc.). These policies will be incorporated with General Plan Amendments into the Community Plans.

The Highways and Freeways Element of the General Plan and the Community Plans will implement the Street Sections, in conjunction with the Highways and Collector Street Dedication and Improvement Section of the L.A. Planning and Zoning Code.

The Specific Plan's urban design guidelines, streetscape guidelines and related sections of the Open Space Element will be implemented in the form of design guidelines through the Site Plan and Development Review Processes.

The Specific Plan recommends establishment of the following three entities to monitor and implement the land use elements of the Specific Plan:

- *City Administrative Unit.* An Administrative Unit within the City's Department of Planning would be established for the following purposes:
 - Oversee the Development Approval and Site Plan Review process;
 - Maintain Development Level and Housing Counts;
 - Maintain Entitlement Level Counts and monitor density bonuses/transfers; and
 - Coordinate the actions of the City required to implement the Plan.

The Department of Planning should assign permanent staff members to the unit necessary to carry out its functions. In addition, staff from the Department of Transportation and Bureau of Engineering should either be permanently assigned to the unit or designated within each department to provide services as required to the Administrative Unit.

- *Community Development Corporation.* A non-profit Central City West Community Development Corporation is proposed as a means of carrying forward the public-private partnership which produced this Specific Plan. Such an organization will be necessary to both ensure implementation of the Plan Elements and maintain the advocacy essential to implementation of the Plan vision. The Development Corporation should be charged with the responsibility of implementing the Specific Plan, its functional land use and transportation policies, and the Transportation Demand Management Plan, including but not necessarily limited to the following responsibilities:

1. Receive from the City development fees charged on new commercial development proposed for the Plan area and expend these monies in accordance with Plan policies;

I. Summary

2. Contract for all engineering studies and consulting services required to design and implement the transportation and other infrastructural improvements required by the Plan and its Land Use and Transportation Elements, including:
 - Engineering services for preparation of Project Reports required to place freeway improvement projects into the STIP; and
 - Engineering services for preparation of construction plans, specifications and estimates for infrastructural improvements;
3. Contract for construction/implementation of all infrastructural improvements, within the limitations and guidelines of existing public agencies responsible for maintenance of each infrastructural system;
4. Purchase and dedicate to the City right-of-ways for street improvements and land for development of public parks;
5. Develop public parks and open space improvements;
6. Coordinate with all public agencies responsible for infrastructural improvements required by the Plan;
7. Implement the Transportation Demand Management Plan;
8. Select, in consultation with LADOT, transportation improvements to be implemented during each Stage of Implementation (from the menus presented in the Plan);
9. Make recommendations to the City for Plan changes in response to specific development proposals, changes in the strategy for infrastructural implementation and/or changes in the impacts associated with Plan elements;
10. Prepare and submit annual work programs to the City Council for approval and funding;
11. Program events in the Plan area and implement an ongoing community involvement program; and
12. Provide staff for and participate in the programs of the Housing Development Corporation.

Development fees paid by new commercial development should be collected

I. Summary

by the City and held in a special separate fund to be disbursed to the Development Corporation to fund annually submitted work programs. Quimby Fee paid by new residential development should be disbursed to the Development Corporation in a similar manner for development of parks and open space facilities.

- *Housing Development Corporation.* The Affordable Housing Program should also be implemented through a continuation of the public-private partnership. A non-profit Housing Corporation, as a subsidiary to the Community Development Corporation, is recommended for this purpose and should be charged with administration and implementation of the Affordable Housing Program. To implement the Affordable Housing Program the Corporation should be charged with receiving from the City, Linkage Fees which will be charged on new commercial development and expanding these monies for production of the housing mandated under the Plan's Affordable Housing Program, and to:
 1. Contract for services required to design, construct, market and manage the housing;
 2. Acquire land inside and outside the Plan area required to accommodate the housing;
 3. Select tenants to occupy the housing and maintain waiting lists if required;
 4. Procure additional funding to augment monies raised through the Linkage Fees;
 5. Prepare and submit to the City Council, for approval and funding, annual work programs for production of affordable housing; and
 6. Enter into agreements with private developers to develop, own and operate housing.

The Linkage Fees paid by new commercial development should be collected by the City and held in a special separate fund to be disbursed to the Housing Development Corporation to fund annually submitted work programs.

C. ENVIRONMENTAL IMPACTS

CEQA Background. On November 1, 1988, the Department of City Planning issued an Initial Study pursuant to the California Environmental Quality Act (CEQA), regarding the Central City West Specific Plan then in preparation. The study determined that the Specific Plan would have the potential to result in a significant adverse effect on the environment. Accordingly, the City simultaneously distributed a Notice of Preparation (NOP), and a pre-draft request for comments to interested persons and organizations. Areas of potential impact identified by the Initial Study include the following:

- Earth
- Air: Mobile, Wind Effects
- Water
- Plant Life
- Animal Life
- Noise: Mobile
- Light and Glare
- Land Use
- Risk of Upset
- Population
- Housing
- Transportation and Circulation
- Public Services
- Energy
- Utilities
- Human Health
- Aesthetics
- Recreation
- Cultural Resources.

Project Impacts. The profile of project impacts is presented in Table S-2 Summary of Project Effects. Significant impacts before mitigation would result from the proposed project, however, mitigation has been recommended to reduce each such impact to acceptable levels. Analysis of the following environmental subject areas reveals that potential significant project impacts would be reduced to acceptable levels with mitigation:

- Land Use
- Urban Design: Artificial Light, Shade and Shadow
- Transportation: Traffic, Parking
- Air: Air Quality (mobile), Meteorology (wind effects)
- Noise (mobile)
- Public Services (Fire, Police, Schools, Libraries, Parks)
- Energy Conservation
- Utilities (Water, Sewer, Solid Waste)
- Safety and Risk of Upset
- Earth (Urban Topography, Geologic Hazards)
- Water (Surface Water Runoff/Hydrology, Groundwater)
- Biota (Plant Life, Animal Life)
- Cultural Resources (Archaeology, Paleontology, Historical).

Table S-2
SUMMARY OF PROJECT EFFECTS AND
MITIGATION MONITORING PROGRAM

Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
A. LAND USE				
A.1. General Plan				
The Specific Plan would implement the General Plan provision calling for a Westlake Community Specific Plan to address the transportation and housing impacts of spillover development from the CBD proper.	None required.	None. The project would result in a net beneficial effect through implementation of the Community Plan element of the General Plan which calls for development of a Specific Plan. The project would result in decreased development intensities from those provided for under current land use policies and zoning regulations.	None required.	None required.
A.2. Specific Plan				
The Specific Plan would generally allow for greater development intensities than now exist, but reduced development intensities relative to current land use and zoning provisions. The Specific Plan would provide for growth from the existing 8 million square feet (MSF) of non-residential space in CCW to 25 MSF by the year 2010, and 35 MSF at buildout under the Specific Plan, compared to the existing Community Plan potential of 42 MSF at buildout.	The Specific Plan Ordinance should contain a procedure for monitoring and regulating the phasing of commercial land use development versus the construction of housing, achievement of transportation demand management objectives, and implementation of programmed transportation improvements to ensure Specific Plan success. The City should identify a party to be assigned authority for such monitoring and oversight.	With recommended mitigation, the Specific Plan would result in greater land use intensities than now exist in the Central City West area. No significant adverse impacts on other Specific Plans would result from the proposed project.	Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.	Prior to adoption of Specific Plan Ordinance. Continuing annual monitoring and reporting.

Table S-2
SUMMARY OF PROJECT EFFECTS AND
MITIGATION MONITORING PROGRAM

Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
B. URBAN DESIGN				
B.1. Aesthetics & Views				
<p>The Specific Plan would include urban design measures to ensure appropriate scale of buildings in terms of height, bulk and orientation; to provide for orderly design of driveways, building entrances, service delivery and trash collection; to enhance the area's focus on pedestrian circulation; to preserve significant historic resources; to enhance recreational amenities; and to improve the local streetscape.</p>	<p>Design of the aerial portions of the Glendale transitway should include adjacent landscaping and structural texturing and articulation to reduce potential visual impacts.</p>	<p>No significant adverse impacts. The Specific Plan would result in a net beneficial effect through replacement of existing vacant lots and deteriorating uses in Central City West with an orderly assemblage of uses comprising a self-contained urban village.</p>	<p>LADOT, Caltrans and LACTC shall incorporate design elements into aerial transitway and transit mall.</p>	<p>Prior to transitway and transit mall construction.</p>
	<p>The Specific Plan Ordinance should include measures to reduce the potential for the narrow-walled canyon effect on CCW streets, through application of mandatory step-backs similar to those proposed for the residential transition zones of the Specific Plan. Alternatively, height contours appropriate to the area's topography, would help avoid such impacts.</p>	<p>The Specific Plan skyline would result in reduction of existing viewsheds, but would avert development of massive structures which would severely obstruct existing hillside views, as allowed under current land use and zoning designations.</p>	<p>Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.</p>	<p>Prior to adoption of Specific Plan Ordinance.</p>

Table S-2
SUMMARY OF PROJECT EFFECTS AND
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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
B.2. Artificial Light				
<p>The project would provide for growth in Central City West, which would add potential new sources of light and glare to the existing residential environment. The Urban Design Element of the Specific Plan will require plant materials to reduce reflectivity of hardscape surfaces.</p>	<p>The Specific Plan Ordinance should contain regulations regarding the size, type, number and orientation of signs for uses in the Specific Plan area.</p>	<p>With recommended mitigation, the Specific Plan would not result in significant adverse artificial light and glare effects on project area uses.</p>	<p>Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.</p>	<p>Prior to adoption of Specific Plan Ordinance.</p>
	<p>Individual project lighting plans must be approved by Department of Building and Safety to ensure that lighting will not adversely affect neighboring residential property. Exterior glazing shall be PPG-S-20 glass or similar low-reflectivity product.</p>		<p>Department of Building and Safety and Advisory Agency shall ensure compliance.</p>	<p>Before approval of building permits for individual projects.</p>
B.3. Shade and Shadow				
<p>The Specific Plan would allow for mid-rise and high-rise structures which will increase the potential for shade and shadow impacts on existing sensitive residential and open space uses in the project area. Encouragement of mixed use development and dedication of open space within permitted Central City West projects increases the potential for such impacts. Specific Plan R3 and R4 transition zones would reduce potential shade and shadow impacts of commercial high-rises on residential uses.</p>	<p>Individual mid-rise and high-rise proposals must be evaluated for shade and shadow impacts on sensitive residential and open space uses both adjacent to and within the proposed project. The Site Plan Review Process should be directed to consider the potential for general shading within a locale in the proposed R5, C or M zones as an element of building and public space design.</p>	<p>With recommended mitigation, shade and shadow impacts of permitted developments would continue, but would be controlled and reduced to acceptable levels. The potential for consolidated general shading from many buildings can be satisfactorily mitigated through the Site Plan Review Process.</p>	<p>Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.</p>	<p>Prior to adoption of Specific Plan Ordinance.</p>
			<p>Site Plan Review Committee shall review projects for general shading impacts.</p>	<p>Before approval of building permits for individual projects.</p>

Table S-2
SUMMARY OF PROJECT EFFECTS AND
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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe	
C. JOBS AND HOUSING					
C.1. Housing and Population					
<p>The Specific Plan would halt the demolition-without-replacement of existing housing in Central City West. The project would ensure that existing residents are provided with adequate affordable replacement housing. The overall impact of the Plan's Housing Element will be an increase of 7,700 housing units.</p>	<p>To ensure that replacement housing for dwelling units removed is produced in a timely manner, the Specific Plan Ordinance should require that such units be available for occupancy commensurate with issuance of a Certificate of Occupancy to the commercial development responsible for production of such housing.</p>	<p>The Specific Plan would result in a net beneficial effect through the addition of housing affordable to buyers and renters in a variety of income categories.</p>	<p>Department of City Planning shall draft ordinance.</p> <p>City Planning Commission & City Council shall approve and adopt ordinance.</p>	<p>Prior to adoption of Specific Plan Ordinance.</p>	
	<p>Housing Development Corporation shall ensure compliance.</p>	<p>Prior to approval of Certificate of Occupancy for individual projects.</p>			
C.2. Housing Affordability					
<p>The project would contribute needed housing in a wide variety of income categories in the project vicinity, including some 5,300 units of low and very-low income dwelling units.</p>		<p>None required.</p>	<p>The project would result in a net beneficial effect through the development of affordable housing stock.</p>	<p>None required.</p>	<p>None required.</p>
C.3. Job-Housing Balance					
<p>The project would contribute needed housing in a wide variety of income categories to the job-rich Central City Subregion, with a 178% increase in the number of units in CCW. However, the project ratio of 6.6 jobs/dwelling unit alone will not result in achievement of year-2010 job-housing balance objectives for the greater Subregion.</p>	<p>None required.</p>	<p>The project would result in a net beneficial effect through the addition of needed housing over both existing and Community Plan buildup levels.</p>	<p>None required.</p>	<p>None required.</p>	

Table S-2
SUMMARY OF PROJECT EFFECTS AND
MITIGATION MONITORING PROGRAM

Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
D. TRANSPORTATION AND CIRCULATION				
D.1. Traffic				
<p>Development the Specific Plan land use entitlements by the year 2010 would result in 11,695 added pm-peak trips and 112,072 added daily trips, 107% and 140% increases over existing levels, respectively. Buildout of the plan would result in 20,467 added pm-peak and 185,088 added daily trips, 187% and 232% increases over existing.</p>	<p>Implement \$100 million in street improvements (including ATSAC at 60 intersections, widenings, closures, and realignments), \$150 million in freeway and ramp improvements, and \$315 million in transit improvements (including a new MetroRail Station, HOV Transitway, pedestrian improvements and TDM programs) in Central City West. Additional mitigation should be required to mitigate significant adverse impacts of the plan compared to without-plan future conditions, including (see DEIR Section IV.N.1 for complete descriptions):</p> <ul style="list-style-type: none"> • Roadway and intersection improvements. • Freeway improvements. • Individual project-level intersection analyses. • Revised intersection impact significance thresholds to more equitably distribute remaining roadway capacity and more evenly distribute mitigation requirements. 	<p>With recommended mitigation, the Specific Plan would result in increased traffic but greater system capacity, and higher use of alternative transportation modes. Without recommended mitigation beyond the plan's transportation program, significant pm-peak congestion would continue at 2 out of 29 study intersections in 2010; with recommended mitigation, these impacts would be reduced to acceptable levels. Significant beneficial effects would occur at 2 out of 29 study intersections.</p>	<p>LADOT, Caltrans, LACTC and SCRTD shall design, implement and construct proposed freeway, ramp, roadway, signal and transit improvements.</p> <p>Local Development Corporation shall ensure phasing of transportation improvements commensurate with land use development, according to the four CCW program phases.</p>	<p>Improvements shall be timed according to the four land use development phases specified in the Specific Plan; cumulative non-residential land use development in CCW shall not proceed from one phase to the next if the transportation improvements programmed for that phase (or measures with equivalent effectiveness) have not been implemented. The phases are specified as:</p> <ul style="list-style-type: none"> • 6.25 million sq feet • 12.5 million sq feet • 18.75 million sq feet • 25 million sq feet.

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SUMMARY OF PROJECT EFFECTS AND
MITIGATION MONITORING PROGRAM

Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
D.1. Traffic (continued)				
<p>Development of the Specific Plan transportation improvements will require right-of-way dedication within and immediately adjacent to Central City West of some 11.2 acres (at some 65 study area parcels), with an approximate value of \$60 million. Dedications would be required as a part of the development approval process, however, some locations (parcels or portions of parcels) may require condemnation to acquire needed right-of-way.</p>	<p>The Specific Plan Ordinance should require dedication of right-of-way before approval of permitted CCW developments.</p>	<p>With recommended mitigation, the Specific Plan would not result in significant adverse effects on right-of-way in and around the Central City West area.</p>	<p>Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.</p>	<p>Prior to adoption of Specific Plan Ordinance.</p>
D.2. Parking				
<p>Development of the Specific Plan will require 42,500-45,000 parking spaces serving Central City West by the year 2010, of which 38,250 would be for single-occupant vehicles, 4,250 would be required for high-occupancy vehicles (HOV), and 2,500 could be optionally provided for HOVs.</p>	<p>The Specific Plan ordinance should provide for the periodic evaluation of TDM achievement and parking adequacy in and around the study area, including assessment of the need for measures to reduce spill-over parking impacts on residential neighborhoods.</p>	<p>With recommended mitigation, the Specific Plan would not result in significant adverse effects on parking in and around Central City West.</p>	<p>Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.</p>	<p>Prior to adoption of Specific Plan Ordinance.</p>

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SUMMARY OF PROJECT EFFECTS AND
MITIGATION MONITORING PROGRAM

Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
D.3. Access and Alternative Modes				
The Specific Plan would program \$312 million in public transit infrastructure improvements, including development of a Wilshire & Bixel MetroRail Station, a transit mall connecting the Harbor Transitway with a new aerial connection to the north via Glendale Boulevard, four shuttle buses to supplement the DASH system shuttles, and purchase of 291 buses. Development of demand necessary to support this transit system is in part dependent on an aggressive transportation demand management (TDM) program geared specifically to the needs and opportunities of CCW.	None required.	None.	None required.	None required.
E. AIR				
E.1. Air Quality: Mobile				
Development of Specific Plan entitlements by the year 2010 would contribute to a 0.34% increase in mobile-source emissions over future without-project conditions due to increased vehicle-miles traveled, but would yield a decline relative to present levels due to a cleaner vehicle fleet mix.	Transportation demand management measures proposed with regard to traffic impacts are needed to additionally mitigate mobile-source air impacts. Trip-reduction measures (carpooling, transit, alternative work weeks) should be emphasized over measures intended to shift trips out of the peak period.	Despite recommended mitigation, adverse impacts on air quality would continue to result from Specific Plan development. However, reduced traffic volumes and congestion would have a beneficial effect on mobile-source air emission levels.	LADOT shall monitor compliance with TDM provisions.	Continuing annual monitoring and reporting.
E.2. Air Quality: Stationary (Determined not significant by the Initial Study.)				

Table S-2
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MITIGATION MONITORING PROGRAM

Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
E.3. Meteorology: Wind Effects				
High-rise structures developed under the Specific Plan could contribute to wind jetting and turbulence, causing discomfort for pedestrians.	High-rise structures should require wind modeling which takes into account the structure's design and location relative to existing and planned structures nearby, to determine the effects and design improvements necessary to reduce wind jetting and turbulence to acceptable levels.	With recommended mitigation, the Specific Plan would not result in significant adverse effects on wind effects in and around Central City West.	Site Plan Review Committee shall ensure compliance with mitigation.	Prior to approval of Building Permits for individual projects.
F. NOISE: Mobile				
Development of Specific Plan entitlements by the year 2010 and at buildout would result in significant construction noise in the project area. Additionally, development of above-grade high-occupancy vehicle (HOV) facilities at the north and south ends of Central City West would create new sources of noise impacts.	Enhance landscape plans in areas of sensitive receptors (hospitals, residences, schools and parks) to buffer and absorb ambient noise. Develop plans for functional, safe and attractive sound barriers for above-grade segments of HOV facilities in the northern (residential) area of the project area. Structural construction work should be limited to the hours of 7am-9pm Monday-Friday and 8am-6pm Saturday. Power construction equipment should use noise shielding and muffling devices.	With recommended mitigation, adverse impacts would be reduced to acceptable levels. Reduced traffic volumes and congestion would have a beneficial effect on mobile-source noise levels.	LADOT, Caltrans and LACTC shall incorporate design elements into aerial transitway and transit mall.	Prior to transitway and transit mall construction.
			Department of Building and Safety shall ensure project construction compliance with Noise Ordinance.	Before and during construction of individual projects.
			Local Development Corporation and Site Plan Review Committee shall ensure landscape plan compliance.	Before issuance of Building Permits for individual projects.

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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
G. PUBLIC SERVICES				
G.1. Fire Protection				
The Specific Plan in the year 2010 could be served by the existing fire stations in the area, but would require added fire-flow and hydrants in the area's water system and additional staff and equipment at existing stations.	Individual development proposals will be required to expand water systems in the project area to serve an individual site. Tax revenues from permitted development will fund expansion of fire protection facilities and services, under the coordination of the Local Development Corporation.	With recommended mitigation, project and cumulative impacts would be reduced, but permitted growth would result in demand for significantly greater fire services over existing levels.	LAFD, Bureau of Engineering, LADWP, and Advisory Agency shall ensure compliance for individual projects.	Before issuance of Building Permits for individual projects.
	Local Development Corporation shall monitor facility development.	Continuing annual monitoring and reporting.		
G.2. Police Protection				
The Specific Plan in the year 2010 would require addition of a police substation in the project area, with associated additional staff and associated equipment.	The Specific Plan Ordinance should identify a mechanism to ensure that required added police protection facilities are developed in the project area. Such services could be provided through either the Los Angeles Police Department (LAPD) or through one private security service serving Central City West, under the coordination of the Local Development Corporation.	With recommended mitigation, project and cumulative impacts would be reduced, but permitted growth would result in demand for significantly greater police services over existing levels.	Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.	Prior to adoption of Specific Plan Ordinance.
	Individual development proposals should comply with recommendations from the Crime Prevention Unit of LAPD and with Municipal Code security standards.		Local Development Corporation shall monitor facility development.	Continuing annual monitoring and reporting.
			LAPD and Advisory Agency shall ensure compliance for individual projects.	Before issuance of Building Permits for individual projects.

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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
G.3. Schools				
The Specific Plan would generate an estimated 873 elementary students, 426 junior high school students, and 426 high school students for a total of 1,725 new students. Without expansion, existing overcrowding of area schools would worsen.	City should assist in identifying land that could be used for school construction.	With recommended mitigation, project impacts would be reduced to acceptable.	LAUSD shall monitor school needs and coordinate identification of land for school construction.	Continuing annual monitoring and reporting.
	Department of Building and Safety shall collect school fees.	Before issuance of Building Permits for individual projects.		
G.4. Libraries				
The Specific Plan would result in the addition of 18,000 residents in the CCW area. This population would exacerbate the existing need for library expansion in the area.	Expanded library facilities should be funded through Community Facility District assessments.	With recommended mitigation, project impacts would be reduced to acceptable.	LA Public Library shall monitor library needs and coordinate identification of opportunities for library expansion.	Continuing annual monitoring and reporting.
G.5. Parks and Recreation				
The Specific Plan provides for the addition of open space and recreational resources totalling about 70 acres. Some 18 acres of the proposed park space is programmed as public park, with the remainder associated with specific permitted developments.	The Specific Plan Ordinance should ensure access to a majority of open space area and recreational resources developed in Central City West to attain a minimum of 52 acres total serving the area, through the administration of a Local Development Corporation.	With recommended mitigation, project impacts would be reduced to acceptable.	Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.	Prior to adoption of Specific Plan Ordinance.
			Local Development Corporation shall coordinate phasing of park development.	Continuing annual monitoring and reporting.

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SUMMARY OF PROJECT EFFECTS AND
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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
H. ENERGY CONSERVATION				
Development of the Specific Plan in the year 2010 would result in an added daily energy demand of some 345 Mwh of electricity and 872 Mcf of natural gas, increases of 185% and 284%, respectively.	Individual projects permitted under the Specific Plan must conform to State Energy Efficiency Guidelines.	Despite recommended mitigation, growth under the Specific Plan would continue to result in significant increased demand for energy over existing levels in Central City West.	Department of Building and Safety and LADWP shall ensure compliance with energy conservation requirements.	Prior to issuance of Building Permits for individual projects.
I. UTILITIES				
I.1. Power (See Section H - Energy Conservation)				
I.2. Natural Gas (See Section H - Energy Conservation)				
I.3. Water Conservation				
Development of Specific Plan entitlements by the year 2010 would result in increased water consumption of some 2.96 MGD over existing levels, an increase of 114%.	Individual projects developed under the Specific Plan should comply with City requirements for water conservation devices in new structures (Ord. 163,532). The Specific Plan Ordinance should require xeriscape using native and drought-tolerant species in Central City West.	Despite recommended mitigation, growth under the Specific Plan would continue to result in significant increased water consumption over existing levels in Central City West.	Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.	Prior to adoption of Specific Plan Ordinance.
			Department of Building and Safety and LADWP shall ensure compliance with water conservation requirements.	Prior to issuance of Building Permits for individual projects.

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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
I.4. Sewers				
Development of Specific Plan entitlements by the year 2010 would result in increased sewer demand of some 2.05 MGD over existing levels, an increase of 86%.	The Specific Plan Ordinance should require dual plumbing of commercial structures to provide for grey-water recycling.	Despite recommended mitigation, growth under the Specific Plan would result in significant increased sewer demand over existing levels in Central City West.	Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.	Prior to adoption of Specific Plan Ordinance.
	Individual projects developed under the Specific Plan should comply with City requirements for water conservation devices in new structures (Ord. 163,532). No new sewer hook-ups shall be allowed before treatment capacity is available (Ord. 164,964).		Advisory Agency and Bureau of Engineering shall ensure compliance with waste water requirements.	Prior to issuance of Building Permits for individual projects.
I.5. Storm Water Drainage (See Section L - Surface Water Runoff)				
I.6. Solid Waste				
Development of Specific Plan entitlements by the year 2010 would result in increased solid waste generation of 84 tons per day over existing levels, an increase of 183%.	The Specific Plan Ordinance should require source separation and recycling of development projects and existing residential and non-residential uses in Central City West.	Despite recommended mitigation, growth under the Specific Plan would result in significant incremental stress on dwindling landfill resources in the region.	Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.	Prior to adoption of Specific Plan Ordinance.

Table S-2
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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
J. SAFETY AND RISK OF UPSET				
Specific Plan development on abandoned wells may cause hazardous concentrations of natural gas to accumulate under impermeable surfaces and may prevent natural migration of gas. Because historical records on the oil field are not complete the abandonment technique used and the depth of the wells is not known causing a concern with development over inactive wells.	A survey should be completed on permitted development sites in the oil field area to verify the abandonment status of any inactive wells and to estimate the likelihood and extent of gas accumulation. Based on these surveys all wells may have to undergo reabandonment to meet present standards. The Specific Plan Ordinance should require either gas venting systems or the maintenance of some wells as active to keep such gas from accumulating to dangerous levels. If all active wells are abandoned then a gas venting system sufficient to maintain gas at acceptable levels should be installed to the satisfaction of the State Division of Oil and Gas.	With recommended mitigation, adverse impacts would be reduced to acceptable levels.	Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.	Prior to adoption of Specific Plan Ordinance.
With regard to use, storage and transportation of hazardous materials, there will be an incremental increase in the amount of industrial development permitted as compared to existing conditions. This will result in the potential for an increase in the amount of hazardous materials used and the amount of hazardous wastes generated in this area.	With regard to the use and generation of hazardous materials, conformity with all applicable local, state and federal requirements must be ensured before approval of permitted industrial development.		State Division of Oil and Gas shall approve gas venting systems and well abandonment practices.	Prior to issuance of Building Permits for individual projects.
Construction of permitted projects may involve the removal and disposal of asbestos and other hazardous materials.			LAFD and state Department of Health Services shall monitor hazardous materials storage, use and transportation.	Continuing annual monitoring and reporting.

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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
K. EARTH				
Excavation necessary for Specific Plan land use and transportation facility development by the year 2010 will result in the net export of approximately 4-6 million cubic yards of earth, (some of which may be Class-I soils due to past and current oil extraction).	The Local Development Corporation should identify guidelines (primary routes and times of day) for individual project haul routes. Comply with Municipal Code Grading Regulations. If hazardous soils are exported, dispose of at Class-I dump.	With recommended mitigation, adverse effects would be reduced to acceptable levels.	Department of Building and Safety Grading Division shall approve haul routes and issue grading permits.	Prior to issuance of Building Permits for individual projects.
L. WATER				
The Specific Plan would increase permeable ground surfaces through increased open space, and would reduce the area's overall runoff for a given size storm. However, individual sites may not be adequately served by existing storm sewers in terms of size or configuration.	Individual development proposals' on-site storm drains, off-site connections, extensions and/or expansions should be designed and constructed to the satisfaction of the City Engineer.	With recommended mitigation, Specific Plan impacts would be reduced to acceptable levels.	Bureau of Engineering shall determine storm water system needs.	Prior to issuance of Building Permits for individual projects.
	Individual developments shall comply with applicable provisions of the Flood Hazard Management Ordinance and requirements of the Bureau of Engineering.		Department of Building and Safety shall ensure compliance with Flood Hazard Management Ordinance.	
Excavation of subterranean structures for projects permitted under the Specific Plan may encounter groundwater at depths of 20-30 feet, depending on season of the year.	Individual development projects should utilize dewatering systems and measures to prevent construction runoff from flowing into on-site excavations and into uses off-site.	With recommended mitigation, adverse effects would be reduced to acceptable levels.	Department of Building and Safety shall approve proposed construction and dewatering practices.	Prior to issuance of Building Permits for individual projects.

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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
M. BIOTA				
Development of uses permitted under the Specific Plan would result in the replacement of existing vacant lots and attendant common pioneer species of plants and animals with a mix of structures and open space resources.	None required. (See I.3 - Water Conservation, above, regarding use of native, drought-tolerant xeriscape species for plan area landscaping.)	No significant adverse effects.	None required.	None required.
N. NATURAL RESOURCES (Determined not significant by the Initial Study.)				
O. CULTURAL RESOURCES				
O.1. Archaeological Resources				
As a built urban environment with few subterranean structures, little is known about the potential for prehistoric resources in Central City West. However, the greatest potential for significant resources is in the northern two-thirds of the study area.	The first projects permitted in the study area north of Sixth Street should conduct site surveys for archaeological resources. Subsequent development proposals should conduct surveys until the Department of City Planning determines that the area has been adequately investigated.	With recommended mitigation, the potential for significant adverse effects would be reduced to an acceptable level.	Department of City Planning shall ensure adequate monitoring of the potential for archaeological resources.	Prior to issuance of Building Permits for individual developments, with continuing annual monitoring and reporting.
O.2. Paleontological Resources				
Same as O.1.	Same as O.1.	Reduced to acceptable with recommended mitigation.	Same as O.1.	Same as O.1.

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Environmental Impacts	Recommended Mitigation Measures	Net Unavoidable Significant Effects	Monitoring & Enforcement Agencies	Required Performance Timeframe
O.3. Historical Resources				
<p>The Specific Plan identifies receptor zones for historic structures, but does not forbid demolition of such structures; as a result, development of permitted projects may result in the demolition of significant historic resources. Out of 1,404 parcels in the Specific Plan area, 358 buildings are of potential historic significance due to age and style. This comprises fully one out of every four structures in the study area. Although no buildings have been federally listed, 3 structures may be eligible for listing on the National Register of Historic Places. At the City level, 3 buildings are designated Historic-Cultural Monuments. Historic clusters include 65 structures worthy of consideration for inclusion within Overlay Zones. In addition, 10 individual buildings merit consideration as Historic-Cultural Monuments of the City of Los Angeles.</p>	<p>The Specific Plan Ordinance should identify specific historic structures to be maintained and/or moved to designated receptor zones, and provide incentives for property owners to preserve these structures. Future studies should be conducted to determine the potential for the establishment of Historic Preservation Overlay Zones.</p>	<p>With recommended mitigation, the potential for significant adverse effects would be reduced, but not eliminated in that individual property owners cannot be forced to maintain a structure without compensation.</p>	<p>Department of City Planning shall draft ordinance. City Planning Commission & City Council shall approve and adopt ordinance.</p>	<p>Prior to adoption of Specific Plan Ordinance.</p>
			<p>The City Planning Commission shall recommend structures for consideration to the City Cultural Heritage Commission shall designate appropriate recommended buildings and clusters as Historical Cultural Monuments and Overlay Zones.</p>	<p>Prior to issuance of demolition permits for 81 structures recommended in draft Specific Plan Ordinance for historic designation.</p>

D. BENEFICIAL EFFECTS

Implementation of the proposed Specific Plan would result in the following beneficial effects, some of which are also noted in Table S-2:

- Implementation of the Community Plan element which calls for development of a Specific Plan to address the transportation and housing impacts of spillover development from the CBD proper.
- Provision of construction and construction-related employment opportunities.
- Replacement of existing vacant lots, incompatible adjacent uses and deteriorating structures with an orderly assemblage of uses designed according to areawide guidelines regarding the following urban design elements: • height, bulk and orientation; • requirements for ground floor retail; • access specifications for driveways, building entrances, service delivery and trash collection; • enhancement of pedestrian circulation; • preservation of historic resources; • expansion of recreational and open space amenities; and • streetscape improvements.
- The Urban Design Element of the Specific Plan will require plant materials to reduce the reflectivity of hardscape surfaces.
- The Specific Plan would halt the demolition-without-replacement of existing housing in Central City West.
- Long-term provision of increased housing opportunities and affordable housing in the Central City West area of the Westlake and Silver-Lake Echo Park Communities, with the associated beneficial effects on transportation and air quality resulting from improved job-housing balance compared to development under the existing Community Plan.
- The Specific Plan will provide mechanisms for implementation of an integrated system of transportation improvements including the following: • \$100 million in street improvements (including ATSAC at 60 intersections, street widenings, closures and realignments); • \$150 million in freeway and ramp improvements; and • \$315 million in transit improvements (including a new MetroRail station, HOV transitway, pedestrian and TDM programs) in and around Central City West.
- Reduced traffic volumes and congestion would have a beneficial effect on local air quality and ambient noise, compared to future without-plan conditions.
- The Specific Plan Ordinance proposes requirements for dual plumbing of commercial structures to provide for grey-water recycling, and for solid waste source separation and recycling in Central City West.
- Development permitted under the Specific Plan will result in the proper reabandonement of capped oil wells in the area and installation of gas venting systems to reduce the current risk of hazardous gas accumulation.
- The Specific Plan Ordinance will ensure the protection of significant historic resources.
- Long-term increase in City tax base from property taxes, business licenses and retail sales tax.

E. ALTERNATIVES ANALYSIS SUMMARY

Introduction. The State and City CEQA Guidelines require that an EIR describe a range of reasonable alternatives to the project, or alternative locations of the project, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of these alternatives. The Guidelines further require that the No Project alternative and its impacts be evaluated, and that discussion focus on alternatives capable of eliminating any significant adverse environmental effects of the project or of reducing them to a less-than-significant level. If an alternative is clearly superior to the proposed project, it is to be designated as such. If the alternative with the least environmental impact is the No Project alternative, then one of the other alternatives is to be designated as the environmentally superior alternative, if applicable.

Overview. Several scenarios have been analyzed in this section to ensure assessment of a reasonable range of alternatives to the proposed project: alternatives that develop the project area at different levels of intensity as well as an alternative development mix of land uses. In addition, discussion of the relevance of an alternative location is presented. These alternatives are identified below:

- Alternative 1 - No Project: Community Plan Year 2010 (16M sq ft)
- Alternative 2 - No Project: Community Plan Buildout (42M sq ft)
- Alternative 3 - No Project: Freeze on Development in CCW (8.5M sq ft)
- Alternative 4 - Less-Intensive Specific Plan (16M sq ft)
- Alternative 5 - Alternative Use Mix (25M sq ft)
- Alternative 6 - Alternative Location (25M sq ft)

Land use for each of these scenarios is compared to existing and proposed plan levels in Table S-3. The CEQA-required "No Project" alternative could be construed as either no *physical* change from existing conditions within the project area or no *policy* change from existing conditions. Alternatives 1 and 2 present year-2010 and buildout scenarios for no policy change. Alternative 3 reflects no physical change (no growth) in the CCW area, despite continued development in the surrounding vicinity.

Alternative 4 presents the effects of a one-third reduction in total land use development (a less-intensive Specific Plan), compared to the proposed Specific Plan. Alternative 5 presents a different mix of land uses from those of the proposed Specific Plan, by analyzing a scenario of co-dependence with development of the Central Business District, by holding commercial uses relatively constant and building out the remaining Specific Plan square footage as residential uses and by providing peripheral parking for the CBD. Alternative 6 discusses the applicability of an alternative site for the specific Plan. These analyses are detailed in Table S-4, and are followed by a concluding section regarding selection of an environmentally-superior alternative.

Table S-3

CENTRAL CITY WEST LAND USE ALTERNATIVE SCENARIOS
 (thousands of square feet, and dwelling units)

Land Use	1989	Year-2010	Buildout	Market	Buildout	Freeze	Lower	Alternative
	Existing	Specfc Plan	Specfc Plan	Comm Plan	Comm Plan	No-Growth	Density	Use Mix
	Base	Project	Project	Alt-1	Alt-2	Alt-3	Specfc Plan	Specfc Plan
Commercial	6,030	24,648	35,363	14,747	40,292	6,030	14,747	6,505
Office	5,184	21,368	30,657	12,940	35,353	5,184	12,940	5,184
Retail	527	1,002	1,438	586	1,602	527	586	1,002
Hotel	319	2,278	3,268	1,221	3,337	319	1,221	319
Industrial	436	356	510	523	1,428	436	523	436
Institutional	1,992	1,992	1,992	1,992	1,992	1,992	1,992	1,992
Nonresidential	8,458	26,996	37,865	17,262	43,712	8,458	17,262	8,933
Residential units	4,300	11,900	14,450	4,000	8,050	4,300	4,000	31,970

Source: Planning Consultants Research, based on Meyer & Allen Associates, 1989.

ALTERNATIVE 1:

NO PROJECT - COMMUNITY PLAN (YEAR 2010 MARKET FORECAST)

This alternative presents an environmental analysis of the project area under conditions of no *policy* change from existing conditions, that is, a market-based forecast of commercial development and residential demolition under the policies of the existing Community Plan and zoning governing the project area.

Under this alternative, the project would not be implemented but development under the existing Westlake Community Plan would continue. No changes in existing policies to accommodate the proposed Specific Plan would occur; however, physical development would continue, as scheduled, to satisfy established Community Plan development milestones. Development would follow the existing Community Plan land use designations and the AB283 zoning regulations. This alternative considers a market forecast of the Community Plan in the year 2010, which would represent approximately 16 million square feet of nonresidential use and a total of approximately 4,000 dwelling units. Alternative 1 residential and nonresidential totals decrease, relative to the Specific Plan, by 66% and 37%, respectively. Residential uses would comprise more than half of the Plan area and would be concentrated primarily in the northern portion. Commercial uses would be greatest in the central area and adjacent to the Harbor Freeway, and retail uses are identified along major east-west arterials.

Summary Comparison. Despite the substantially lower land use development level projected in the market forecast for this alternative, continued growth in CCW and regional traffic generation without adequate funding and development of an integrated program of roadway, transit and demand management improvements would result in increased congestion and traffic related impacts on air pollutant and noise levels overall. Development would be less intensive with associated lower demand for services and utilities, but the job-housing ratio would become more imbalanced, increase from 6.6 under the Specific Plan to 16 under this alternative. Finally, urban design and historic protection policies would not be furthered through this alternative. Therefore, overall, this alternative would not be considered clearly environmentally superior to the Specific Plan.

Economic Feasibility. Although Alternative 1 would not be considered clearly environmentally superior to the proposed project, several subject areas, notably demand for utilities and services, are forecast to achieve lower impacts relative to the Specific Plan. Therefore, an assessment of the economic feasibility of the alternative is important to a complete understanding of its implications.

Alternative 1 - development under a continuation of current Community Plan policies - would not incorporate an integrated or comprehensive system of development fees as proposed under the Specific Plan to fund infrastructural improvements to the

I. Summary

Specific Plan and greater CBD areas. The existing Central City West Interim Control Ordinance (ICO) has a set expiration date, and it, like all ICOs in the City is dependent, by City Planning Commission policy, upon the existence of a significant planning program. Thus, were there no Specific Plan process, there would be no ICO and no ICO funding mechanism. However, if the developer fees set under the ICO continued under some other mechanism, the 16M square feet of development projected under this alternative would result in approximately \$100 million of revenues available for transportation improvements. This amount would only be sufficient to cover most of the expenditures associated with Community Plan highway and street widening by the year 2010. There would not be sufficient revenue for development of improved transit systems or added service, and no new funds would be available for transportation demand management programs. In addition, this alternative would not set development fees for affordable housing development, and would not enable housing replacement nor additional housing production, both of which are basic objectives of the proposed Specific Plan.

ALTERNATIVE 2: NO PROJECT - COMMUNITY PLAN (BUILDOUT)

Like Alternative 1, this alternative presents an environmental analysis of buildout of the project area under conditions of no *policy* change from existing conditions, that is, a projection of full development of commercial entitlements and residential potential under the policies of the existing Community Plan and zoning governing the project area.

Under this alternative, implementation of the Specific Plan would not occur, and, like Alternative 1, development within the area would continue. This alternative represents total buildout to the maximum allowable development densities of the Westlake Community Plan which would result in approximately 43 million square feet of nonresidential use and approximately 8,050 dwelling units. Alternative 2 residential totals, compared to the Specific Plan buildout scenario, represent a 32% decrease in dwelling units. Conversely, Alternative 2 nonresidential buildout totals, relative to those of the Specific Plan, represent an increase of some 15%. As mentioned in the description of Alternative 1, the Westlake Community Plan envisions a mix of residential and commercial uses with residential being the predominate use north of Beverly Boulevard and commercial uses increasing to the south. Retail uses are concentrated along the major east-west arterials. Industrial uses would be located in the southern portion. Approximately 60% of the specific plan area is designated for commercial uses and 35% of the land area is designated for residential development.

Summary Comparison. Under this alternative, traffic congestion and related impacts on air and noise in and around the CCW area would continue to increase, with

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limited opportunities to address facility needs or to implement demand management strategies. While this alternative makes no provision for affordable housing, the job-housing balance ratio of 18.3 is also about 70% higher (less balanced) than buildout of the Specific Plan. Demand for services and utilities would be equal to or higher than under buildout of the Specific Plan. Finally, urban design and historic protection policies would not be furthered through this alternative. Therefore, overall, this alternative is clearly not superior environmentally to buildout of the proposed Specific Plan.

Economic Feasibility. Since none of this alternative's impacts on the issues evaluated in this document are superior to those of the proposed Specific Plan, an assessment of economic feasibility has not been prepared.

ALTERNATIVE 3:

NO PROJECT - FREEZE ON EXISTING DEVELOPMENT (YEAR 2010)

This alternative presents an environmental analysis of the project area under conditions of no *physical* change from existing conditions, that is, a no-growth freeze at existing land use intensities of commercial and residential uses, while growth would be expected to continue as cited in the analysis of related projects in DEIR Section III.B, as well as in the Cumulative Impact DEIR subsections IV.A-IV.O.

Alternative 3 represents existing land use designations within the Plan area with projected growth in the surrounding area in the year 2010. As exists in the Plan area today, under this alternative almost one third of the net parcel area would be currently vacant. Alternative 3 residential totals represent a 64% decrease in housing stock compared to levels outlined in the proposed Specific Plan. Furthermore, this alternative reduces total nonresidential levels by 67% relative to the Specific Plan. Residential uses, which occupy approximately 25% of the Plan area would be concentrated in the northern portion and commercial uses, which together with the industrial uses, occupy approximately 26% of the net buildable and are located along the freeway corridor, the east/westbound streets and the Wilshire area. Industrial uses are located in the northern portion along Glendale Boulevard and in the southern portion of the Plan area, along Olympic Boulevard. Community and public uses account for another 15% of the land within the Specific Plan area. The Temple-Beaudry area contains the majority of the residential uses and the commercial core is specific to the Wilshire area and in the eastern portion of the Plan area. Retail uses are concentrated on the east/west corridors throughout the Plan area.

Summary Comparison. Under this alternative, traffic congestion in and around the CCW area would continue to increase due to regional growth, with no opportunities to address facility needs or to implement demand management strategies. The existing

I. Summary

problems associated with unmet demands for fire and police protection, schools, and parks would remain. Existing situations of non-conforming uses would continue, urban design policies to create positive streetscape, landscape and design of structures would not be implemented, and oil wells in residential areas would remain without proper reabandonment. Overall, this Alternative is not clearly environmentally superior to the proposed Specific Plan. Under this Alternative, there would be no development in the Plan area but there would be no mitigation of existing environmental degradation. Additionally, there would be the continued removal of housing without replacement of suitable alternatives for residents. Finally, there would be continued impact from regional growth that would adversely influence traffic demand and associated impacts such as air quality and noise. Since no environmental subject areas are environmentally superior to the proposed project, no analysis of financial feasibility is necessary.

ALTERNATIVE 4: LESS-INTENSIVE SPECIFIC PLAN (16M SQ FT)

This alternative presents an environmental analysis of the project area under conditions of adoption of a Specific Plan of reduced-intensity, that is, a lower forecast of commercial development and residential demolition under the policies of the existing Community Plan and zoning governing the project area.

This alternative assumes adoption of a Specific Plan with a reduced commercial and residential density. Like the Specific Plan, a well balanced mix of uses is sought, but at lower intensity. Total nonresidential land uses would be reduced by 36% compared to the Specific Plan. Residential units would increase by almost 11% from the Community Plan, but be reduced by 25% from the Specific Plan. Land use designations would occupy the same general areas as the proposed plan.

Summary Comparison. Despite the substantially lower land use development level projected under a less-intensive Specific Plan alternative, continued growth in the Plan area and regional traffic generation without adequate funding and development of an integrated program of roadway, transit and demand management improvements would result in increased congestion and traffic related impacts on air pollutant and noise levels overall. Development would be less intensive with associated lower demand for services and utilities. The job-housing ratio would be comparable to that of the proposed Specific Plan, however the total housing produced and/or replaced under this alternative would be less than under the proposed Specific Plan. In particular, the ability to provide affordable housing would be economically undermined in this alternative, as discussed below. Therefore, overall, this alternative is not clearly environmentally superior to the proposed Specific Plan.

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Economic Feasibility. Although this Alternative appears to provide a reduction in some environmental adverse effects relative to the Specific Plan, consideration of the economic feasibility of certain of its key provisions is necessary. To implement this less-intensive alternative, maximum allowable FAR under the Specific Plan would be reduced from 6.0 to 4.0 in the C2 zone. Based on an economic analysis of FAR 4.0 development intensities, the development fees supportable at land prices in the Plan area of \$200 to \$300 would render infeasible assessment of fees for the transportation, housing and related infrastructural improvement components of Plan implementation, as demonstrated in the pro forma analyses included in the DEIR and discussed below.

Under FAR 6.0 scenarios of C2-zone entitlements, if a total of 16 million square feet of non-residential uses were developed, land costs at the market rate of some \$250 per square foot of commercially-zoned land would represent under 20% of total development costs, and would total \$666,000,000 for CCW development. Under the FAR 4.0 scenario, the same land costs would comprise over 25% of total development costs. The result, under the FAR 4.0 - \$250/SF Land Cost scenario would be that net income for hotel, office and other non-residential uses would be lower than costs at a 10% rate of return, making such development, as well as the payment of developer fees, economically infeasible. Retail uses under this scenario could pay fees of some \$5.44 per square foot more than existing fees assessed through City-wide programs (including parks, schools and sewers). The average non-residential rate of a nominal \$0.19 per square foot available for CCW programs of transportation infrastructure and housing development. Therefore, depending on land cost, many types of proposed development would not be economically feasible. Furthermore, the projected revenue generated from development fees (a maximum of some \$66 million) would not be sufficient to fund transit, transportation demand management or housing programs proposed by the Specific Plan even at reduced densities in this alternative.

ALTERNATIVE 5: SPECIFIC PLAN WITH ALTERNATIVE MIX OF USES

This alternative presents an environmental analysis of the project area under conditions of adoption of a Specific Plan comprising the same total amount of building space (total residential plus non-residential built-form), but with a revised zoning and land use element, such that the bulk of new development would occur in residential uses, and with a revised transportation element to provide peripheral parking in CCW for the CBD proper.

Under this alternative, the Central City West area would develop as a support area for the expanding central business district. Total nonresidential development levels, relative to the Specific Plan, would be reduced by almost 74% relative to the proposed 25M square foot Specific Plan. Total residential units would potentially increase by

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some 169%, and retail uses would be allowed to reach the same levels as under the Specific Plan (doubling existing retail square footage), to support this residential growth. Increased residential density would be accommodated through utilization of existing vacant portions of the project area as well as redevelopment of existing uses area-wide to provide additional housing and new parking areas for the use of downtown development. It should be noted that the development of over 30,000 dwelling units in the Plan area, almost 28,000 units more than presently exist, is dependent upon adequate market absorption for such residential growth. Rezoning of a considerable amount of property presently zoned commercial to residential zoning would be necessary to implement this alternative.

Summary Comparison. Although the housing levels assumed under this alternative would improve job-housing balance in the Central City area to better than the proposed Specific Plan, better than existing, and more balanced than the present City-wide average, the resultant environmental benefits which should follow such policy implementation would not be expected to result. Traffic on regional facilities in the CBD-hub would remain within 1% of existing levels, and local roadway and intersection traffic volumes would simply be transferred from the CBD to CCW; related effects on air and noise would be similar to the proposed project. Urban design and utility demand would also be similar to that of the proposed project. Therefore, overall, this alternative would not be considered clearly environmentally superior to the Specific Plan.

Economic Feasibility. Even if entitlements were established through a Specific Plan for this level of residential development in the CBD area, the required demand would not exist for construction and occupancy of the units projected under this alternative. Since the demand for market rate housing in the Plan area is sufficient to absorb only 8,300 dwelling units, implementation of this alternative would be dependent on subsidization of over 23,000 units. As discussed above with regard to the Housing Market, by linking housing and commercial development, the proposed Specific Plan would maximize the ability to use developer fees from non-residential development to fund the production and replacement of housing. Yet, this alternative simultaneously reduces the amount of non-residential land uses which create the ability to afford subsidization in the Specific Plan, and increases the number of units to be subsidized some five-fold. The sources of such prospective subsidies are not known. Therefore, this alternative is not believed to be economically feasible.

ALTERNATIVE 6:

ALTERNATIVE LOCATIONS FOR THE PROJECT (25M SQ FT)

Where actions and/or projects which are subject to environmental review under CEQA are site specific, the City and State CEQA Guidelines require evaluation of a reasonable range of alternative locations which could eliminate any significant adverse

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environmental effects of the project or reduce them to less-than-significant levels, while still feasibly attaining the basic objectives of the project. The use of a different location is a choice characteristically most available to public agencies for certain types of specific public facilities (such as fire stations, storage yards, transportation facilities, utilities and public buildings) in which development of the facility, itself, is the primary consideration and its precise location or alignment, within bounds, is secondary. With specific private projects, the same range of latitude is practically not available because of the cost and length of time required to secure the site-specific prerequisites and entitlements for development, and because a permissible use for a given site is characteristically being sought, rather than the reverse.

In the case of the proposed Specific Plan, consideration of alternative locations is impractical. While the Specific Plan does regard a specific geographic area of the City, the stated objectives of the Plan are an outgrowth of the social/cultural needs, physical circumstances and market opportunities associated with the Plan area, itself. These specified objectives can be satisfied in no other geographic section of the City or region because they do not originate within nor apply to any other geographic section. Indeed, each other area of the City and region is already, by law, subject to land use regulations comprised of General Plan (with or without underlying community plans) and Planning and Zoning Codes which express the applicable jurisdictions' determination of optimal land use policies to implement local planning objectives for those areas. Because local planning policies must respond to local circumstances, Specific Plan policies from one area cannot necessarily be relocated to another area with any hope for success. Therefore, consideration of alternative locations to the Plan area is not a realistic alternative to the proposed Specific Plan.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Although some alternatives may, with regard to individual environmental subject areas, be superior to the proposed project, on an overall basis, none of the alternatives analyzed could be considered clearly environmentally superior to the proposed project.

Although Alternative 1 - No Project - Community Plan Year 2010 (16M sq ft), through a freeze on *policy* conditions within the plan area, would reduce the built area of development within the plan area, and would likewise reduce the demand for services and utilities, it would not achieve the urban design objectives of the plan, nor would it improve traffic and access relative to the Specific Plan overall, nor would it have the policy basis or financial capacity to program needed transportation improvements, affordable housing development or protection of historic resources. Alternative 2 - Community Plan Buildout (42M sq ft) - would likewise lack the benefits inherent in the proposed Specific Plan, and would additionally create substantially greater demand for public services and utilities. Alternative 3 - No Project - Freeze on Development in

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CCW Area (8.5M sq ft) would freeze *physical* conditions within the plan area. Growth in traffic in surrounding areas would continue without a vehicle for mitigation of regional traffic growth as proposed under the Specific Plan Transportation Element. Housing removed to date would not be replaced, nor would new affordable housing be produced. Hazardous conditions with regard to unreinforced brick dwellings and structures in the project area would continue, as well as the continued occupancy of residential uses adjacent to improperly abandoned oil wells. Although demand for public services and utilities would be less than under the proposed Specific Plan, no funding or authority would be created to address existing deficiencies.

Although Alternative 4 - Less-Intensive Specific Plan (16M sq ft) - would represent a Specific Plan with a lower intensity of both commercial and housing development with associated reduced massing, visual, utility, and public service impacts, implementation of needed regional transportation improvements would be hindered through reduced developer fees due to lower intensity development. In fact, traffic and housing impact fees would be basically insupportable were C2 densities reduced from FAR 6.0 entitlements under the plan to FAR 4.0 under this alternative. In addition, depending on land costs for particular parcels, commercial development under these lower entitlements would be economically infeasible, as demonstrated in the pro forma analysis presented with this alternative. Alternative 5 - Alternative Use Mix (25M sq ft) - would result in similar impacts as the proposed Specific Plan, despite a greatly improved job-housing balance ratio. In addition, housing market information demonstrates the insupportability of the levels of residential development assumed under this alternative. Alternative 6 - Alternative Location (25M sq ft) - would not implement the Community Plan which calls for a Specific Plan for the Central City West area to address issues of housing and traffic.

Table S-4

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

Impact Area	Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)	Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)	Alternative 2 No Project: Community Plan Buildout (42 MSF)	Alternative 3 No Project: No Growth Freeze in CCW (8 MSF)	Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)	Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)
A. LAND USE	The Specific Plan would implement the General Plan provision calling for a Westlake Community Specific Plan to address the transportation and housing impacts of spillover development from the CBD proper. The project would result in a net beneficial effect through implementation of the Community Plan element of the General Plan which calls for development of a Specific Plan. The project would result in decreased development intensities than those provided for under current land use policies and zoning regulations.	This alternative would not implement the General Plan provision calling for development of a Specific Plan. Adverse transportation and housing effects resulting from spillover development from the CBD would continue.	This alternative would not implement the General Plan provision calling for a Specific Plan. The absence of a Specific Plan would result in significant adverse impacts from spillover development from the CBD.	This alternative would not implement the General Plan provision calling for a Specific Plan. The absence of a Specific Plan would result in potentially adverse effects resulting from spillover development from the CBD.	This alternative would result in a marginal net beneficial effect due to the development of a less intensive Specific Plan that would fulfill the provisions of the General Plan. However, feasibility to implement indicated transportation and housing improvements would not exist under this alternative.	This alternative would fulfill the provisions of the General Plan calling for a Specific Plan, however, ability to implement transportation and housing improvements without commercial growth would be limited. It would attempt housing development beyond its market potential and CBD parking at the expense of nonresidential development. It would require zone changes of commercial to residential.
A.1. GENERAL PLAN						
A.2. SPECIFIC PLAN	The Specific Plan at FAR 2.9 would generally allow for greater development intensities than now exist, but reduced development intensities relative to current land use and zoning provisions. The Specific Plan would provide for growth from the existing 8 million square feet (MSF) of non-residential space in CCW to 25 MSF by the year 2010, and 35 MSF at buildout under the Specific Plan, compared to the existing Community Plan of 16 MSF by the year 2010, and 42 MSF at buildout.	Commercial density would reach FAR 1.75. Residential densities would be 66% lower and nonresidential development would be approximately 37% less than the Specific Plan. Uses would comprise: Office - 12.9MSF, Retail - 586,000SF, Hotel - 1.2MSF, Industrial - 523,000SF Residential - 4000 units Parking - 39,042 spaces.	Commercial density would reach FAR 4.8. Nonresidential densities would be about 15% greater than Buildout of the Specific Plan. Additionally, residential densities would be 32% less than for Buildout of the Specific Plan. Uses would comprise: Office - 35.35MSF Retail - 1.6MSF Hotel - 3.3MSF Industrial - 1.4MSF Residential - 8,050 units Parking - 91,999 spaces.	No new development would be undertaken which would result in a 64% decrease in residential density. Meanwhile, total nonresidential uses would be 67% lower than Specific Plan. Uses would comprise: Office - 5.2 MSF Retail - 527,000SF Hotel - 319,000SF Industrial - 0.44MSF Institutional-1.99MSF Residential-4,300 units Parking - 24,355 spaces.	Commercial density would reach FAR 1.75. Resulting in a 36% decrease in total residential and a decrease of 25% in residential density relative to the Specific Plan. Uses would comprise: Office - 12.9MSF Retail - 586,000SF Hotel - 1.2MSF Industrial - 523,000SF Institutional-1.99MSF Residential - 8,925 units Parking - 39,042 spaces.	Overall density would be similar to the proposed Specific Plan (FAR 2.9). Total nonresidential would be 67% lower than under the Specific Plan. Residential density would be 69% higher than the Specific Plan. Uses would comprise: Office - 5.2MSF Retail - 1.0MSF Hotel - 319,000SF Industrial - 436,000SF Institutional-1.99 MSF Residential - 31,970 units Parking - 85,285 spaces.

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

<u>Impact Area</u>	<u>Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)</u>	<u>Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)</u>	<u>Alternative 2 No Project: Community Plan Buildout (42 MSF)</u>	<u>Alternative 3 No Project: No Growth Freeze In CCW (8 MSF)</u>	<u>Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)</u>	<u>Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)</u>
B. URBAN DESIGN	The Specific Plan would include urban design measures to ensure appropriate scale of buildings in terms of height, bulk and orientation; to provide for orderly design of driveways, building entrances, service delivery and trash collection; to enhance the area's focus on pedestrian circulation; to preserve significant historic resources; to enhance recreational amenities; and to improve the local streetscape.	Existing uses and environmental decay would continue with no improvements to local streetscapes, setback guidelines, landscaping requirements and height limitations. Lower density could result in less massing and height.	Increased aesthetic impact due to greater massing. Existing uses and environmental decay would continue, with no improvements to local streetscapes, setback guidelines, landscaping requirements and height limitations.	Existing non-conforming uses and environmental decay would continue.	Reduction in project impacts. Lower massing profile would reduce aesthetic impacts due to scale. However, the ability to implement urban design guidelines would be limited by financial feasibility.	Similar to proposed project, however peripheral parking structures located in residential areas would make implementation of urban design guidelines difficult.
B.1. AESTHETICS						
B.2. ARTIFICIAL LIGHT	The project would provide for growth in Central City West, which would add potential new sources of light and glare to the existing residential environment. The Urban Design Element of the Specific Plan will require plant materials to reduce reflectivity of hardscape surfaces.	This alternative would result in new sources of light and glare similar to the proposed project.	This alternative would result in new sources of light and glare similar to the proposed project.	No impact due to no new development.	This alternative would result in new sources of light and glare similar to the proposed project.	Similar to the proposed project but increased residential and parking densities would provide additional opportunity for artificial light and glare.

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

<u>Impact Area</u>	<u>Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)</u>	<u>Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)</u>	<u>Alternative 2 No Project: Community Plan Buildout (42 MSF)</u>	<u>Alternative 3 No Project: No Growth Freeze In CCW (8 MSF)</u>	<u>Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)</u>	<u>Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)</u>
B.3. SHADE AND SHADOW	The Specific Plan would allow for mid-rise and high-rise structures which would increase the potential for shade and shadow impacts on existing sensitive residential and open space uses in the project area. Mixed use development and dedication of open space within proposed Central City West projects increases the potential for such impacts. Specific Plan R3 and R4 transition zones and shadow limitations would reduce potential shade and shadow impacts of high-rises on residential uses.	Reduced FAR would decrease the potential for shade and shadow impacts, however lack of height limitations and shadow guidelines would allow for unmitigated impacts.	Greater FAR and the absence of any height limits would increase the potential for shade and shadow impacts.	Existing shade and shadow conditions would not change.	Reduced FAR would decrease the potential for shade and shadow impacts.	Similar to the proposed project.
C. JOBS AND HOUSING	The Specific Plan would halt the demolition-without-replacement of existing housing in Central City West. The project would ensure that existing residents are provided with adequate affordable replacement housing.	Reduced housing production. No assurance of replacement housing; no provision of affordable housing.	Reduced housing production. No assurance of replacement housing; no provision of affordable housing.	No new housing or job production.	Lower housing production than proposed Specific Plan; no provision of affordable housing.	Increased housing entitlements compared to proposed Specific Plan, however lack of market for additional housing would reduce potential for added housing growth. No provision of affordable housing.
C.1. HOUSING & POPULATION						
C.2. JOB-HOUSING BALANCE	The project would contribute needed housing in a wide variety of income categories to the job-rich Central City Subregion, with a 178% increase in the number of units in Central City West. However, the project area ratio of 6.6 jobs/dwelling unit alone will not result in achievement of year-2010 job-housing balance objectives for the greater Central City Subregion.	Less balanced (higher) ratio: 16 jobs per dwelling unit. This alternative would have an adverse impact on the job/housing balance relative to the proposed Specific Plan.	Less balanced (higher) ratio: 15.6 jobs per dwelling unit. This alternative would have a substantial adverse impact on the job/housing balance relative to buildout of the proposed Specific Plan.	Relative to the Specific Plan, slightly more balanced (lower) ratio: 6.1 jobs per dwelling unit. This alternative would have a slight beneficial impact on the job/housing balance.	Similar balance ratio: 6.6. This alternative would have a similar effect on the job/housing balance, while producing fewer jobs and dwelling units.	More balanced (lower) ratio: 0.9 jobs per dwelling unit. This alternative would have a large beneficial impact were the housing developed as assumed, however, the market does not appear to exist for this level of housing.

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

<u>Impact Area</u>	<u>Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)</u>	<u>Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)</u>	<u>Alternative 2 No Project: Community Plan Buildout (42 MSF)</u>	<u>Alternative 3 No Project: No Growth Freeze in CCW (8 MSF)</u>	<u>Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)</u>	<u>Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)</u>
D. TRANSPORTA- TION AND CIRCULATION	Development the Specific Plan land use entitlements by the year 2010 would result in 11,695 added pm-peak trips and 112,072 added daily trips, 107% and 140% increases over existing levels, respectively. Buildout of the plan would result in 20,467 added pm-peak and 185,088 added daily trips, 187% and 232% increases over existing. In 2010, of 29 study intersections, 7 would significantly worsen compared to existing LOS, 7 would significantly benefit from the Plan.	Total pm-peak hour trips of 24,800, for an increase of 9% over the Specific Plan: 11 of 29 intersections would worsen in LOS. Daily volumes on adjacent freeways would increase by less than 3%.	Total pm-peak hour trips of 52,750, for an increase of 68% over Buildout of the Specific Plan: 11 of 29 intersections would worsen in LOS. Daily volumes on adjacent freeways would increase by 9-47%.	Total pm-peak hour trips of 10,940, for a decrease of 52% compared to the Specific Plan: 8 of 29 intersections would worsen in LOS. Daily volumes on freeways in the vicinity would decrease modestly.	Total pm-peak hour trips of 24,800, for an increase of 9% over the Specific Plan: 11 of 29 intersections would worsen in LOS.	Total pm-peak hour trips of 33,950, for an increase of 49% over the Specific Plan.
D.1. TRAFFIC AND RIGHT-OF-WAY	Development of the Specific Plan transportation improvements will require right-of-way acquisition within and immediately adjacent to Central City West of 11.5 acres, with an approximate value of \$60 million. These acquisitions (at some 50 study area parcels) would not comprise condemnations, and would only be achieved as required dedications when a development permit is applied for at such a site.	Street widening would require additional right of way acquisition especially along Lucas Ave.	Street widening would require additional right of way acquisition especially along Lucas Ave.	No right-of-way acquisition required.	Right-of-way acquisition program similar to proposed Specific Plan.	Right-of-way acquisition program similar to proposed Specific Plan. Local traffic impacts of peripheral parking facilities would be substantial.

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

Impact Area	Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)	Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)	Alternative 2 No Project: Community Plan Buildout (42 MSF)	Alternative 3 No Project: No Growth Freeze in CCW (8 MSF)	Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)	Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)
D.2. PARKING	Commercial development of the Specific Plan will require 42,500-45,000 parking spaces serving Central City West by the year 2010, of which 38,250 would be for single-occupant vehicles, 4,250 would be required for high-occupancy vehicles (HOV), and 2,500 could be optionally provided for HOVs. Parking for all uses would total 62,500 by 2010.	Total parking spaces for commercial purposes would be about 26,000. Parking for all uses would total about 39,000, 38% less than the Specific Plan.	Total commercial parking spaces would be about 69,000; an increase of about 14% over Buildout of the Specific Plan. Parking for all uses would total about 92,000 spaces, 47% more than the Specific Plan.	Total parking spaces for commercial purposes would be about 10,800; a decrease of about 75% over the Specific Plan. Parking for all uses would total about 24,350 spaces by 2010.	Total parking spaces for commercial purposes would be about 26,000; a decrease of about 40% relative to the Specific Plan. Parking for all uses would total about 39,000 spaces.	Parking for all CCW uses would total 67,285. In addition, peripheral parking for CBD development would add some 18,000 spaces, for a total of 85,285 spaces, 36% higher than the Specific Plan.
E. AIR	Development of the Specific Plan in the year 2010 would result in lower mobile source emission levels than current levels.	Mobile source emissions would increase by about 2.4% relative to the Specific Plan. Local exceedance of carbon monoxide standard at one receptor.	Mobile source emissions would increase 7% relative to buildout of the Specific Plan. Local exceedance of carbon monoxide standard at one receptor.	Mobile source emissions would decrease by about 0.3% relative to the Specific Plan.	Mobile source emissions would increase by about 2% relative to the Specific Plan. Local exceedance of carbon monoxide standard at one receptor.	Mobile source emissions would decrease 0.3% relative to the Specific Plan. Local impacts of parking structures in residential areas would occur.
E.1. AIR QUALITY (MOBILE)						
E.3. WIND EFFECTS	Development of Specific Plan entitlements allows for high-rise structures up to 1,085 feet in height. Such development closely spaced could result in canyon and Venturi effects, turbulence, and pedestrian discomfort.	Lower FAR would reduce potential wind setting effects slightly.	Similar effects as buildout of the Specific Plan.	No change in existing wind effects. Substantially lower impact than the Specific Plan.	Lower FAR would reduce potential wind setting effects slightly.	Similar effects as the proposed Specific Plan but increased residential density may result in additional impacts.
F. NOISE (MOBILE)	Development of Specific Plan entitlements by the year 2010 and at buildout would result in significant added roadway traffic noise at sensitive receptors in the project area. Additionally, development of above-grade high-occupancy vehicle (HOV) facilities at the north and south ends of Central City West would create new sources of noise impacts.	Similar to Specific Plan.	Similar noise to Specific Plan.	Similar to Specific Plan.	Similar to Specific Plan.	Similar to Specific Plan. Additional impacts from parking structures in residential neighborhoods.

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

Impact Area	Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)	Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)	Alternative 2 No Project: Community Plan Buildout (42 MSF)	Alternative 3 No Project: No Growth Freeze in CCW (8 MSF)	Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)	Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)
G. PUBLIC SERVICES	The Specific Plan in the year 2010 could be served by the existing fire stations in the area, but would require added fire-flow and hydrants in the area's water system and additional staff and equipment at existing stations.	Reduced impacts due to reduced resident population.	Increased impacts due to greater daytime population.	No impacts on existing conditions.	Reduced impacts due to reduced resident population.	Similar impacts as Specific Plan.
G.1. FIRE PROTECTION						
G.2. POLICE PROTECTION	The Specific Plan in the year 2010 would require addition of a police substation in the project area, with associated additional staff and associated equipment.	Reduced impacts relative to Specific Plan due to reduced resident population.	Reduced impacts relative to buildout of the Specific Plan due to reduced resident population.	Existing adverse conditions would continue unmitigated.	Reduced impacts relative to Specific Plan.	Increased impacts relative to Specific Plan.
G.3. SCHOOLS AND LIBRARIES	The Specific Plan would result in the addition of 9,000 middle and high income dwelling units and rehabilitation of some 3,000 low and very-low income units in Central City West. Without expansion, existing overcrowding would worsen.	This alternative would generate 25% less new students than the Specific Plan.	This alternative would generate 32% less students than Buildout of the Specific Plan.	This alternative would generate 64% less students than the Specific Plan.	This alternative would generate 66% less students than the Specific Plan.	This alternative would generate 69% more students than the Specific Plan.
G.4. PARKS AND RECREATION	The Specific Plan provides for the addition of open space and recreational resources totalling about 70 acres. Some 18 acres of the proposed park space is programmed as public park, with the remainder associated with specific proposed developments.	Decreased need for open space. Increased opportunities for open space due to reduced FAR.	Reduced opportunities for development of open space due to increased FAR.	Existing deficiencies in open space would continue unabated.	Decreased need for open space. Increased opportunities for open space due to reduced FAR.	Same opportunities as the proposed Specific Plan but increased residential densities may result in marginally less available open space.
H. ENERGY CONSERVA- TION	Development of the Specific Plan in the year 2010 would result in an added daily energy demand of some 353 Mwh of electricity and 802 Mcf of natural gas, increases of 214% and 198%, respectively.	This alternative would result in a 49% reduction in the consumption of natural gas and a 37% reduction in electricity.	This alternative would result in a less than 1% reduction in the consumption of natural gas and a 15% reduction in electricity.	This alternative would result in a 67% reduction in the consumption of natural gas and a 65% reduction in electricity.	This alternative would result in a 32% reduction in the consumption of natural gas and a 32% reduction in electricity.	This alternative would result in a 9% reduction in the consumption of natural gas and a 48% reduction in electricity.

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

Impact Area	Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)	Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)	Alternative 2 No Project: Community Plan Buildout (42 MSF)	Alternative 3 No Project: No Growth Freeze In CCW (8 MSF)	Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)	Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)
I. UTILITIES	Development of Specific Plan entitlements by the year 2010 would result in increased water consumption of some 6,800 KGPD over existing levels, an increase of 114%.	49% decrease in water consumption relative to the Specific Plan.	3% decrease in water consumption relative to Buildout of the Specific Plan.	65% decrease in water consumption relative to the Specific Plan.	30% decrease in the consumption of water relative to the Specific Plan.	5% decrease in the consumption of water relative to the Specific Plan.
I.3. WATER CONSERVA- TION						
I.4. SEWERS	Development of Specific Plan entitlements by the year 2010 would result in increased sewer demand of some 5,230 KGPD over existing levels, an increase of 205%.	46% reduction relative to Specific Plan.	Increase of less than 1% relative to Buildout of the Specific Plan.	66% reduction relative to the Specific Plan.	29% reduction relative to the Specific Plan.	7% decrease relative to the Specific Plan.
I.6. SOLID WASTE	Development of Specific Plan entitlements by the year 2010 would result in increased solid waste generation of 70 tons per day over existing levels, an increase of 208%.	49% decrease relative to the Specific Plan.	No change from Buildout of the Specific Plan.	65% decrease relative to the Specific Plan.	30% decrease relative to the Specific Plan.	3% decrease relative to the Specific Plan.

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

<u>Impact Area</u>	<u>Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)</u>	<u>Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)</u>	<u>Alternative 2 No Project: Community Plan Buildout (42 MSF)</u>	<u>Alternative 3 No Project: No Growth Freeze in CCW (8 MSF)</u>	<u>Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)</u>	<u>Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)</u>
J. SAFETY AND RISK OF UPSET	Specific Plan development on abandoned wells may cause hazardous concentrations of natural gas to accumulate under impermeable surfaces and may prevent natural migration of gas. Because historical records on the oil field are not complete the abandonment technique used and the depth of the wells is not known causing a concern with development over inactive wells.	This alternative would pose a lesser risk of upset due to lesser density of development. Proper abandonment of oil wells would minimize any adverse impacts.	This alternative would pose a lesser risk of upset than Buildout of the Specific Plan due to reduced dwelling units. Proper abandonment of oil wells would minimize any adverse impacts.	Without development, existing oil wells would remain and could present a risk for the existing population.	This alternative would pose a lesser risk of upset due to lesser density of development. Proper abandonment of oil wells would minimize any adverse impacts.	This alternative would pose a similar risk compared to the Specific Plan due to the similar total built form. Proper abandonment of oil wells would minimize any adverse impacts.
	With regard to use, storage and transportation of hazardous materials, there will be an incremental increase in the amount of industrial development proposed as compared to existing conditions. This will result in the potential for an increase in the amount of hazardous materials used and the amount of hazardous wastes generated in this area.	The 47% increase over Specific Plan industrial development would increase the potential for the generation of hazardous wastes.	The 180% increase over Specific Plan industrial development could significantly increase the potential for the generation of hazardous waste.	The 22% increase over Specific Plan industrial development would marginally increase the potential for the generation of hazardous waste.	The 47% increase over Specific Plan industrial development would increase the potential for the generation of hazardous waste.	The 22% increase over Specific Plan industrial development would marginally increase the potential for the generation of hazardous waste.
	Construction of proposed projects may involve the removal and disposal of asbestos and other hazardous materials.					

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS						
Impact Area	Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)	Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)	Alternative 2 No Project: Community Plan Buildout (42 MSF)	Alternative 3 No Project: No Growth Freeze In CCW (8 MSF)	Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)	Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)
K. EARTH	Excavation necessary for Specific Plan land use and transportation facility development by the year 2010 will result in the net export of approximately 4-6 million cubic yards of earth, (some of which may be Class-I soils due to past and current oil extraction).	Lower development intensities would decrease the potential need for grading of the Specific Plan.	Greater development intensities would increase grading relative to buildout of the Specific Plan.	No grading would be required.	Reduced density would likely reduce subsurface excavation.	This alternative would result in increased potential for excavation due to increased residential and parking densities.
K.1. URBAN TOPOGRAPHY						
K.2. GEOLOGIC HAZARDS	Although the Specific Plan area does not overlie any potentially active faults, the project vicinity is subject to ground shaking and liquefaction.	Similar to the proposed project.	Similar to proposed project, though higher density would present increased seismic risk to persons and property.	Unreinforced brick presents a continuing hazard.	Similar to proposed project.	Similar to proposed project.
L. WATER	The proposed Specific Plan would increase permeable ground surfaces through increased open space, and would reduce the area's overall runoff for a given size storm. However, individual sites may not be adequately served by existing storm sewers in terms of size or configuration.	Slightly increased surface runoff due to a greater number of impermeable structures and pavement due to a lack of open space requirements.	Slightly increased surface runoff due to a greater number of impermeable structures and pavement due to a lack of open space requirements.	No change from existing conditions.	Urban design element and landscaping would reduce surface runoff slightly.	Urban design element and landscaping would reduce surface runoff slightly.
L.1. SURFACE WATER RUNOFF/ HYDROLOGY						
L.2. GROUND WATER	Excavation of subterranean structures for projects proposed under the Specific Plan may encounter groundwater at depths of 20-30 feet, depending on season of the year.	Reduced excavation would result in reduced need for dewatering.	Increased excavation would increase the likelihood of encountering the groundwater table.	No significant impacts.	Reduced excavation would result in reduced need for dewatering.	Increased excavation would increase the likelihood of encountering the groundwater table.

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

<u>Impact Area</u>	<u>Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)</u>	<u>Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)</u>	<u>Alternative 2 No Project: Community Plan Buildout (42 MSF)</u>	<u>Alternative 3 No Project: No Growth Freeze in CCW (8 MSF)</u>	<u>Alternative 4 Less-intensive Specific Plan for CCW (16 MSF)</u>	<u>Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)</u>
M. BIOTA	Development of uses proposed under the Specific Plan would result in the replacement of existing vacant lots and attendant common pioneer species of plants and animals with a mix of structures and open spaces resources. High rise structures may provide nesting opportunities for Peregrine Falcons and other endangered raptor species.	No adverse biological impacts. Similar to proposed project.	No adverse biological impacts. Similar to proposed project.	No adverse biological impacts. Similar to proposed project.	No adverse biological impacts. Similar to proposed project.	No adverse biological impacts. Similar to proposed project.
O. CULTURAL RESOURCES	As a built urban environment with few subterranean structures, little is known about the potential for prehistoric resources in Central City West. However, the greatest potential for significant resources is in the northern two-thirds of the study area.	Reduction in grading would decrease the potential for the excavation of cultural resources.	Marginal increase in grading would result in increased excavation of cultural resources.	No significant impacts.	Reduction in grading would decrease the potential for the excavation of cultural resources.	Increased excavation due to greater development of parking and residential units.
O.1.-O.2. ARCHAEOLOGY & PALEON- TOLOGY						

(continued)

Table S-4 (continued)

ALTERNATIVES ANALYSIS: SUMMARY COMPARISON OF IMPACTS

Impact Area	Proposed Specific Plan Year 2010 & Buildout (25 MSF / 35 MSF)	Alternative 1 No Project: Community Plan Year-2010 Market (16 MSF)	Alternative 2 No Project: Community Plan Buildout (42 MSF)	Alternative 3 No Project: No Growth Freeze In CCW (8 MSF)	Alternative 4 Less-Intensive Specific Plan for CCW (16 MSF)	Alternative 5 Alternative Use Mix Year-2010 Emphasis on Housing & Parking (Compare to 25MSF)
O.3. HISTORICAL	The Specific Plan identifies receptor zones for historic structures, but does not forbid demolition of such structures; as a result, development of proposed projects may result in the demolition of significant historic resources. Out of 1,404 parcels in the Specific Plan area, 358 buildings are of potential historic significance due to age and style. This comprises fully one out of every four structures in the study area. Although no buildings have been federally listed, 3 structures may be eligible for listing on the National Register of Historic Places. Of the buildings of potential historic significance, 342 can be categorized as "worthy of note" on the list of evaluation categories accepted by the State Office of Historic Preservation. At the City level, 3 buildings are designated Historic-Cultural Monuments. In addition, 11 individual buildings merit consideration as Historic-Cultural Monuments of the City of Los Angeles.	No guidelines for historic preservation. Continued demolition of residential structures would endanger existing resources.	No guidelines for historic preservation. Continued demolition of residential structures would endanger existing resources.	No guidelines for historic preservation. Continued demolition of residential structures would endanger existing resources.	Increased opportunities for historic preservation due to less intensive development and similar guidelines for historic preservation, as in the specific plan.	Decreased opportunities for historic preservation due to greater new housing and parking density, but would include similar guidelines for historic preservation.

I. Summary

STATEMENT OF APPROVAL

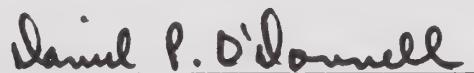
It is hereby stated that this EIR is approved as being completed in compliance with the California Environmental Quality Act and current State and City Guidelines and, based on information now available, may be considered final. However, additional information may be accepted and considered prior to making a final decision on the project. The decision-making body must certify that it has reviewed and considered the information contained in this Environmental Impact Report prior to making such decision.

Submitted by:



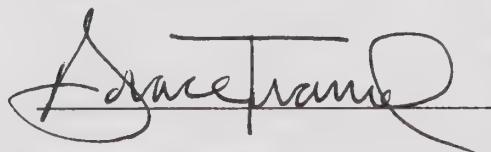
Jay Kaplan-Wildmann, AICP
Director, Environmental Planning
Gruen Associates

Reviewed by:



Daniel P. O'Donnell
City Planner
Neighborhood Planning Division

Approved by:



Horace E. Tramel
Senior City Planner
Neighborhood Planning Division

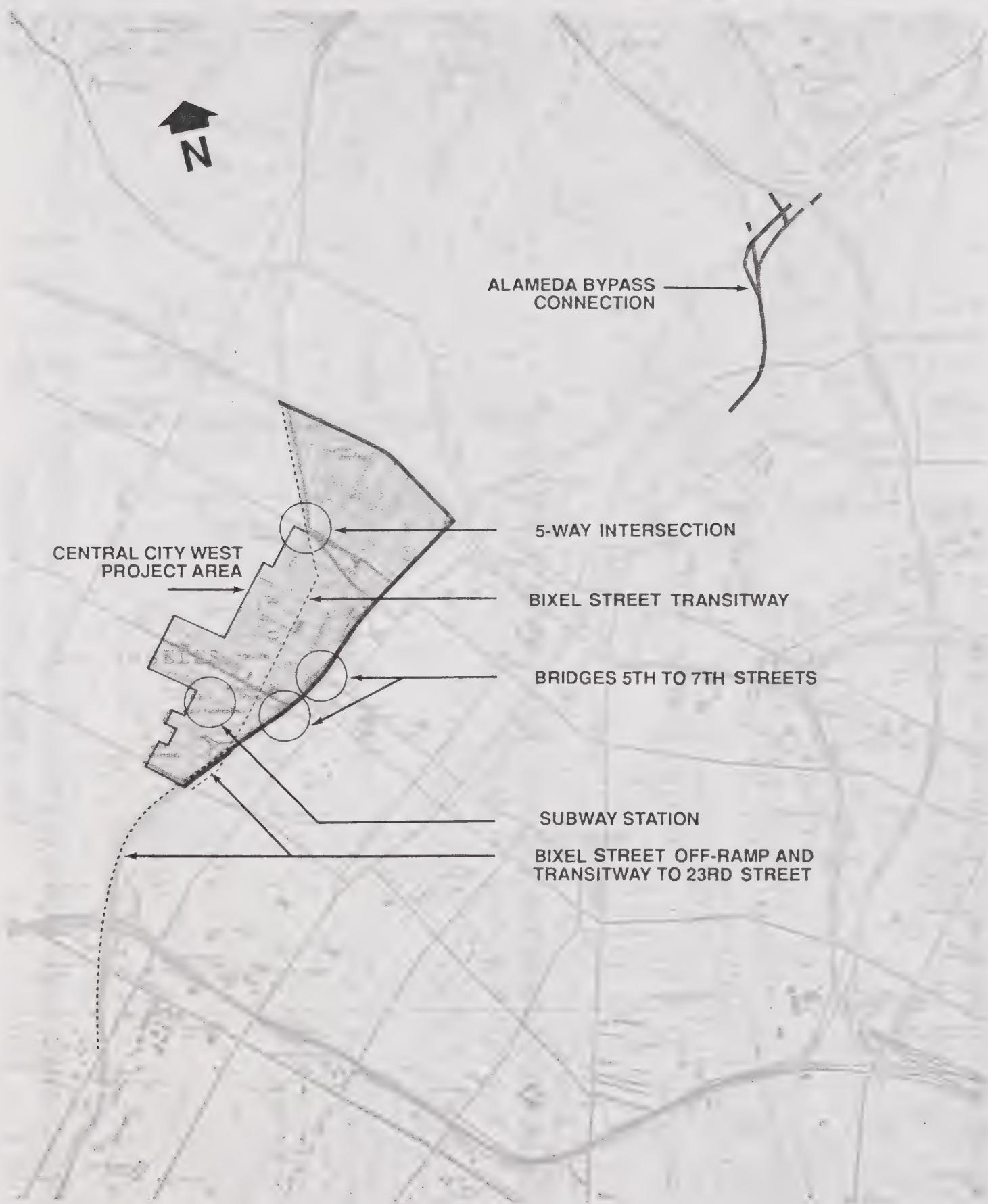
II. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

Housing Entitlements. Although market forecasts indicate a maximum demand for no more than 12,000 dwelling units through the year 2010, buildout of Specific Plan zoning entitlements could provide for 14,450 dwelling units in the plan area over the long-term should a market demand exist. Such increased levels of housing development would be expected to result in improved job-housing balance and related benefits for transportation and air quality impacts. The summary section (Section I) of this document has been revised to reflect this change.

Transportation Improvements. Pursuant to interagency consultation and review of the proposed Transportation Specific Plan, additional analysis of proposed transportation improvements resulted in the following modifications which have been incorporated into the transportation program described in the summary section of this document (see figures):³

- An at-grade Transit Mall on Bixel Street is proposed in place of the previously proposed transit tunnel to address concerns regarding engineering feasibility (grade), high cost of tunnelling, and the engineering requirements to address air and noise impacts within the tunnel. Revised transportation intersection analyses for the CCW study area intersections is presented below in Section III, response to Comment 2.f.
- A redesigned five-way intersection at Glendale and Beverly Boulevards leaves the existing First Street bridge intact, widens both Glendale Boulevard and Lucas Avenue, and adjusts signal phasing at the intersection. This design addresses concerns raised regarding construction and cost impacts of the tunnelling and flyovers and bridge demolition which would have been required under the previously proposed design. Effect on transportation intersection analyses for the CCW study area intersections is presented below in Section III, response to Comment 2.f.
- A realigned Boylston Street would be served directly by on and off ramps from the Harbor Freeway at Sixth and Beaudry Streets to address Caltrans concerns regarding the engineering feasibility of the previously proposed design. In the conceptual development of the realigned Boylston Street, a revised concept plan was developed and evaluated for the Fifth & Sixth Street and Wilshire Bl & Seventh Street bridges over SR-101, and for the connection to the elevated transitway along the Harbor Freeway through the Santa Monica Freeway interchange to 23rd Street. Effect of the Boylston Street realignment and Fifth & Sixth Street ramp reconfigurations on transportation intersection analyses for the CCW study area intersections is presented below in Section III, response to Comment 2.f.

³ CCWA. *Engineering Feasibility of Transportation Improvements*. Prepared by Bechtel Corporation, April 1990.



CENTRAL CITY WEST PROJECT LOCATION MAP

Bixel Street Transitmall

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Legend:

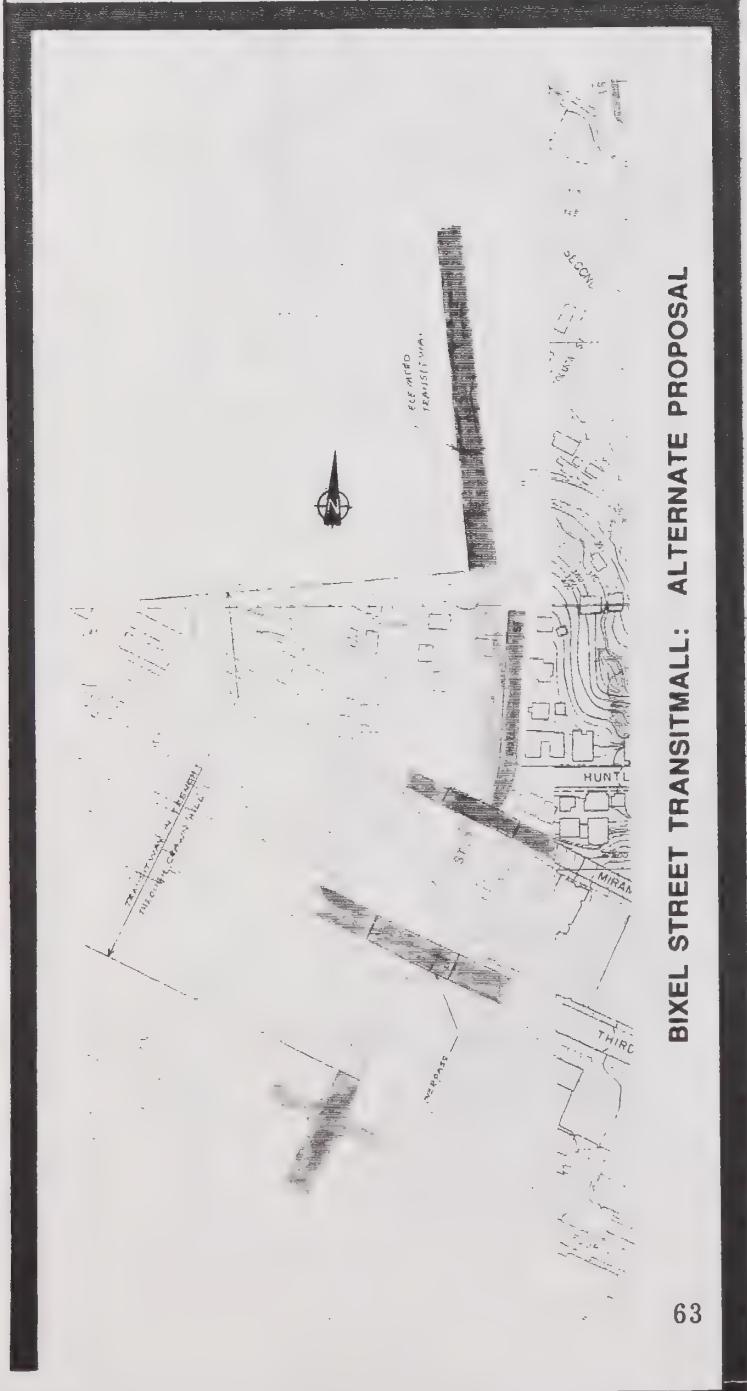
- Existing Pavement to be Removed
- Existing Pavement to Remain
- New Freeway Pavement
- New Ramp and Loop Pavement
- New Local Street Pavement
- Additional Right-of-Way Required
- New Bridge Structure



CENTRAL CITY WEST
Los Angeles, California



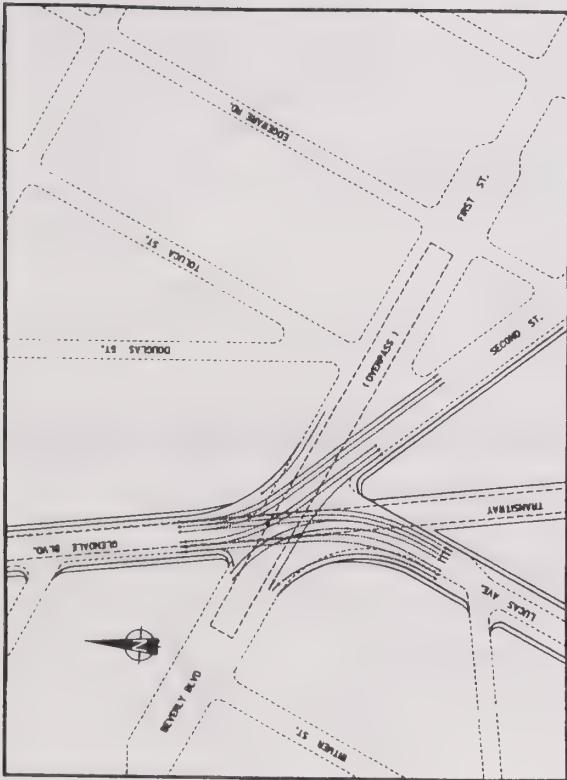
Center
City West
Associates



BIXEL STREET TRANSITMALL: ALTERNATE PROPOSAL



Five-Way Intersection Improvements



LANE CONFIGURATION



IMPROVEMENT PLAN

(Note: Transitway not included in this project.)

Legend:

- Existing Pavement to be Removed
- Existing Pavement to Remain
- New Freeway Pavement
- New Ramp and Loop Pavement
- New Local Street Pavement
- Additional Right-of-Way Required
- New Bridge Structure



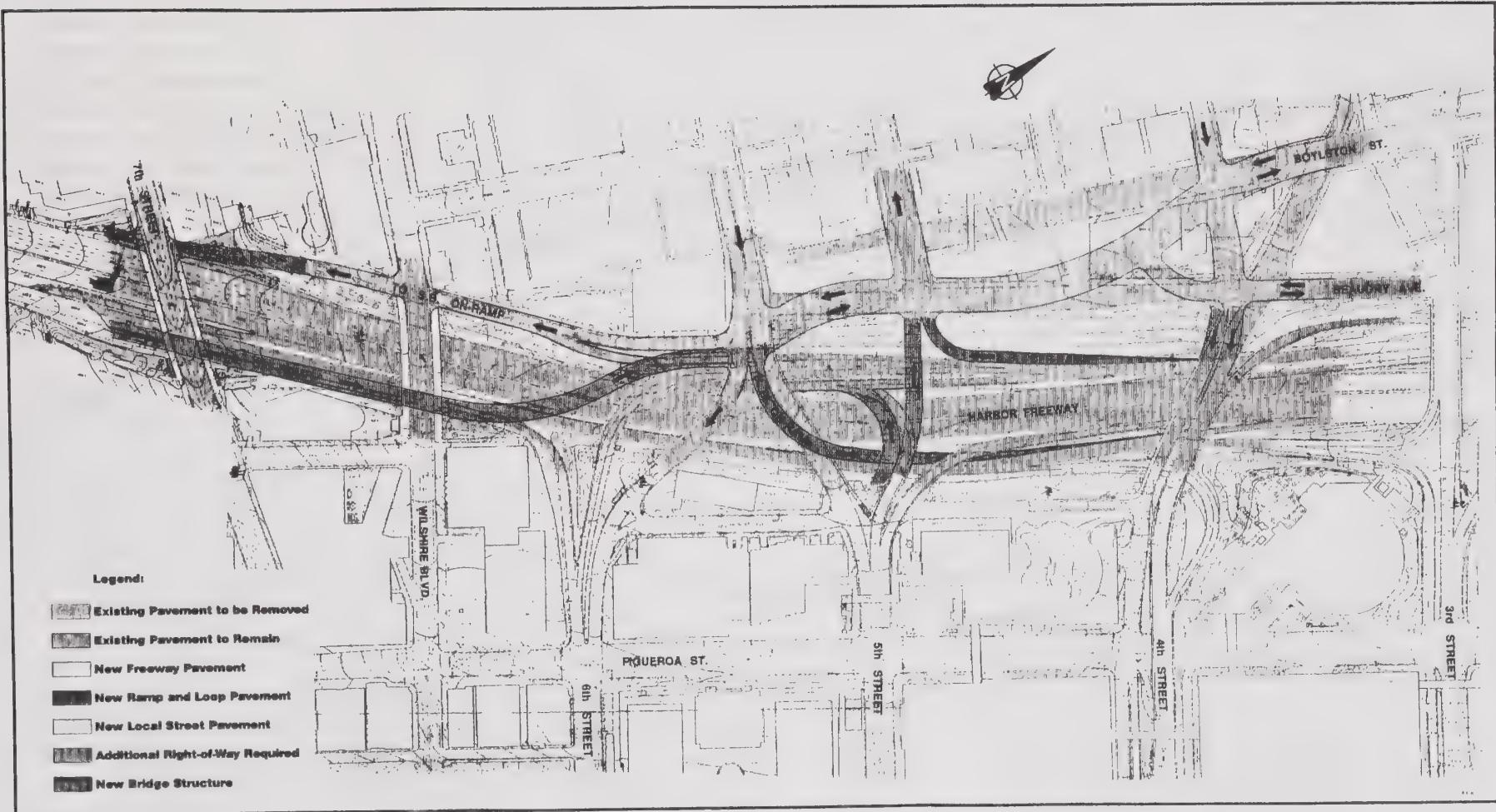
CENTRAL CITY WEST

Los Angeles, California

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City West
Associates**

Boylston Street Realignment and Reconstruction of Harbor Freeway Structures

C95



CENTRAL CITY WEST
Los Angeles, California

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Alameda Bypass Connection

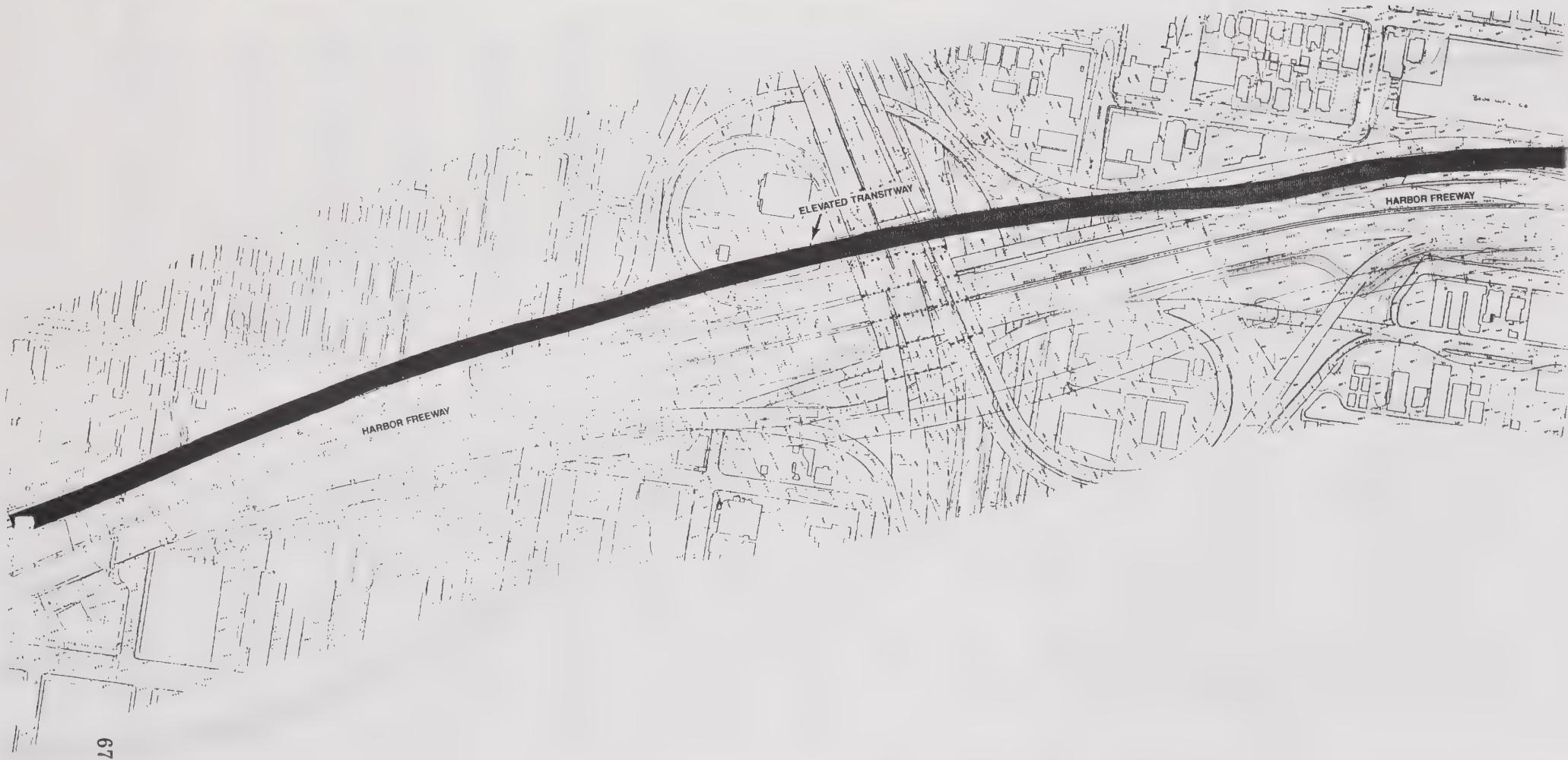
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CENTRAL CITY WEST
Los Angeles, California

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Harbor Freeway Transitway 23rd Street to Bixel Street

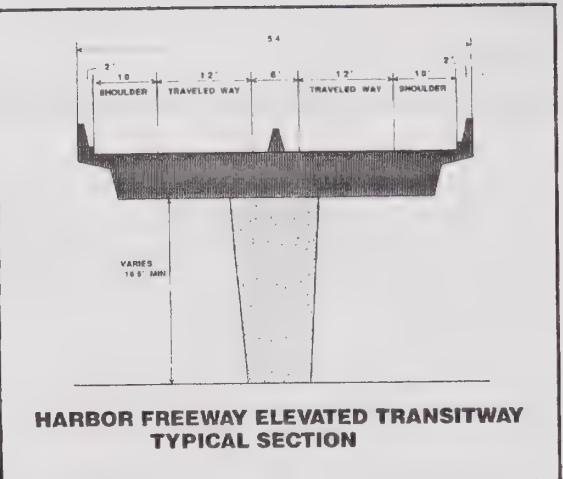


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Los Angeles, California



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City West
Associates



III. RESPONSE TO COMMENTS FROM PERSONS AND ORGANIZATIONS CONSULTED

During and subsequent to the 45-day public comment period regarding the Draft Environmental Impact Report, 61 comment letters were received by the Department of City Planning regarding the Draft EIR, which are excerpted and responded to below. Some comments raised issues regarding the Specific Plan as opposed to the content or adequacy of the EIR, and are responded to by the Department of City Planning under separate cover. In addition to written letters, comments were received at public hearings held on two dates during the comment period regarding the Specific Plan and Draft EIR - February 8 and April 19, 1990. As some comments appear in several submittals, responses to restated comments may refer back to the response to the original comment. Commentors are presented in the following order:

<u>CITY AGENCIES</u>	Page
1. Allyn D. Rifkin, Principal Transportation Engineer LADOT - February 8, 1990	74
2. Charles G. King, Transportation Engineer LADOT - March 19, 1990	74
3. Tony Ennis, Assistant Bureau Commander Bureau of Fire Prevention, LA Fire Department - January 16, 1990	81
4. Garrett W. Zimmon, Captain Planning and Research Division, LAPD - February 5, 1990	81
5. Edward Karapetian, Manager Environmental and Governmental Affairs, DWP - December 18, 1989	81
6. Norman E. Nichols General Manager and Chief Engineer, DWP - February 16, 1990	82
7. Walter W. Hoye Engineer of Design, DWP - February 27, 1990	82
8. Robert J. Niccum, Director of Real Estate Los Angeles Unified School District - February 16, 1990	82
9. Bradley Smith, Division Engineer Wastewater Program Management Division - March 1, 1990	93

III. Response to Comments

10.	Alonzo A. Charmichael, Planning Officer Department of Recreation and Parks - March 1, 1990	96
11.	Robert S. Horii, City Engineer Bureau of Engineering - March 22, 1990	98

STATE AND OTHER AGENCIES

12.	David C. Nunenkamp, Deputy Director, Permit Assistance Office of Planning and Research - February 13, 1990	100
13.	Jerry B. Baxter, District Director Department of Transportation - February 16, 1990	100
14.	John L. Lewis, Chief Technical Support Unit Regional Water Quality Control Bd LA Region - January 12, 1990	101
15.	Anne Baker, Director, Environmental Planning Southern California Assoc. of Governments - February 22, 1990	101
16.	Gary S. Spivack, Director of Planning RTD - February 22, 1990	112
17.	Don Dockray, Codes and Ordinances Administrator Southern California Gas Company - February 7, 1990	114

CCW PROPERTY OWNERS, TENANTS AND REPRESENTATIVES

18.	David Grannis, Association Manager Center City West Associates - February 8, 1990	115
19.	David Grannis, Association Manager Center City West Associates - February 16, 1990	115
20.	Michael Bodoken, Senior Attorney Legal Aid Foundation of Los Angeles - February 8, 1990	115
21.	Michael Bodaken, Senior Attorney Legal Aid Foundation of Los Angeles - February 22, 1990	115

III. Response to Comments

22.	Daniel J. Niemann, Managing Director S-P Company - February 8, 1990	119
23.	Concerned Property Owners of Temple Beaudry - no date	119
24.	Davidson/Waddell - January 20, 1990	119
25.	Bruce W. Manley Manley Oil Company - February 1, 1990	120
26.	Bonnie H. Riedel, Attorney at Law - February 14, 1990	121
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CITY AGENCIES

1. Commentor: Allyn D. Rifkin, Principal Transportation Engineer
LADOT

February 8, 1990

Comment 1.a: It should be noted that the steering committee process did not include the review of the Draft EIR nor the Specific Plan Ordinance, which are the subject of this hearing. The Draft Specific Plan is the Final consultant product, and it was drafted in response to the Final Comments of the Steering Committee. The Department of Transportation is reviewing these documents, both of which are important in understanding the full impacts of the proposed plan. In our review, we have also met informally with TAC Members including Caltrans and the Southern California Association of Governments to provide a better focus on the review of the transportation impacts. As we complete our review, we will provide written comments on the DEIR at a later date.

Response: Comment acknowledged.

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2. Commentor: Charles G. King, Transportation Engineer
LADOT

March 19, 1990

Comment 2.a: Summary of Traffic Impacts. It should be noted that the DEIR applied a significance threshold which is less sensitive than that used by DOT. The DEIR used a 0.02 threshold increase in the intersection v/c ratio at a v/c of 1.00 (LOS F) whereas DOT utilizes an increase of 0.02 at a v/c of 0.90 (LOS E). Applying the DOT threshold definition to the data in the 25 MSF/M2 column of Table 34 results in significant impacts at 3 internal intersections and 2 external intersections or a total of 5 of 29 intersections. For the same column and using the DEIR threshold 2 internal intersections and 2 external intersections are shown to be significantly impacted. The Table 1 Summary of Project Effects incorrectly states that only 2 of 29 intersections would be significantly impacted.

Response: On the contrary, the study Steering Committee with the participation of LADOT set the significance thresholds for use in the Transportation Specific Plan early in the process of development of the DEIR at a criteria level appropriate to assessing the cumulative mitigation needs of such a specific plan. Based on these thresholds, the DEIR correctly states (pages 189, 190 and 195) that 2 in-CCW and 2 external study intersections would be significantly impacted. The Summary of Project Effects (DEIR p. 14) correctly states that it is not within the power of the Specific Plan to reduce traffic impacts to insignificant at the 2 external study intersections.

Comment 2.b: Based on the definitions of M3 (more effective TDM) and M2 (less

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effective TDM) expressed on pg. 175 it would be expected that fewer impacted intersections would result under the more effective TDM scenario (M3). However, scrutiny of the 25 MSF M3 and the 25 MSF M2 discloses that the data must have been transposed. That being the case then the more conservative or more realistic scenario is that having less effective TDM and it actually appears under the column which has been incorrectly titled 25 MSF M3. If this more conservative scenario had been used in reporting significant impacts in Table S-1 of the DEIR then 3 internal intersections and 4 external or a total of 7 of 29 intersections would have been reported. Using the DOT definition of the threshold of significance with the more conservative scenario then 4 internal and 5 external or a total of 9 intersections should have been reported as having been adversely impacted.

Response: On the contrary, since both scenarios were developed to comprise stand-alone Transportation Specific Plans, the less-effective TDM scenario (M2) was formulated with added roadway capacity improvements to ensure that the transportation system could respond to the added demand. The Specific Plan as proposed includes the requirements for more-effective TDM (M3) and the more extensive transportation improvements as a safeguard. The reason why the more-effective TDM scenario (M3) has more impacted intersections is that the M2 scenario includes added facility improvements to address the additional demand (including widening the Hollywood Freeway and development of the Alameda Bypass), which divert traffic from impacted surface street facilities and intersections.

Comment 2.c: It appears that the analysis used 1984 data for the "existing" conditions; hence some streets east of the Harbor Freeway are reported at much better levels-of-service (LOS) for the baseline condition than the LOS's of similar studies for developments in this vicinity. This apparent error would affect the conclusions regarding the ultimate project impacts. Additional mitigation measures may therefore be necessary.

Response: As cited in the DEIR (pages 162-172), traffic volumes and intersection capacity analyses generally reflect study base year (1988) conditions. Freeway conditions were interpolated based on the 1984 and 2010 SCAG regional transportation model.

Comment 2.d: The DEIR does not present adequate analysis of the Harbor Freeway between Routes 101 and I-10. In particular the EIR should report the effects of weaving distances from any new freeway ramps on safety and on capacity of the freeway. Since Harbor Freeway "average daily traffic" (ADT) is reported for existing conditions, ADT should also be reported for the projected conditions.

Response: The DEIR (p. 187) projects Harbor Freeway PM-peak traffic volumes and v/c ratios for each scenario (existing, future without project, future with project), and focuses on the evening peak since this is the

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controlling factor for capacity design purposes. Harbor Freeway PM-peak screenline locations (p. 185) and volumes (p. 187) are indicated in the DEIR. ADT was presented in the environmental setting to provide information on truck traffic impacts. Mitigation measures (p. 200) recommend the capacity improvements necessary to fully respond to added demand.

Comment 2.e: Feasibility of Mitigation Measures. The Specific Plan mitigation of traffic impacts was generally dependent on a comprehensive plan of transportation, transit and TDM measures. Since a strong possibility exists that some of these may not be implemented, due to lack of funding or cooperation by other agencies, the LOS tabulation should include additional scenarios with one or more of the major improvements as described below deleted. Witmer Street/Bixel Street Metro Station. This station is important for attaining CCW rideshare/transit goals but there is a distinct possibility of it not being built. The Southern California Rapid Transit District objects to the proposed station location because of its close spacing to the Seventh Street/Flower Street Station. They also pointed out that no provision has been made in the completed MOS-1 tunnel for knock out panels for a future station or that the existing horizontal and vertical grades may preclude the construction of the proposed station. The EIR should discuss alternative mitigation measures necessary to substitute for the transit service provided by this station.

Response: The Specific Plan as proposed includes the requirements for more-effective TDM (M3) and the more extensive transportation improvements as a safeguard. The early concern regarding station spacing expressed by the SCRTD has been allayed through an initial feasibility study conducted by Bechtel regarding addition of the recommended station in CCW. This study indicates that construction of a new subway station is feasible and can be accomplished without interruption of system operation, assuming alternate single track operation is implemented during the construction period.

Comment 2.f: HOV Transitway. The Harbor Freeway transitway will enter CCW on Bixel Street southerly of 8th Street. Northerly of Seventh Street it is proposed to descend into a tunnel. This tunnel may be constrained in design if Bixel Street is selected to be the route of a sewer line expansion required to provide the additional sewer capacity to serve the future needs of CCW and the CBD. There is also the problem of providing adequate ventilation in the tunnel.

Response: Based on a detailed review of operational constraints (such as tunnel noise and air quality concerns), station layout requirements and projected costs of a transit tunnel, Bechtel developed an alternative plan to meet the same functional objective. The revised plans call for an at-grade transit mall on Bixel Street between 4th-6th, with the southern approach grade separated over Wilshire, touching down mid-block between Wilshire and Sixth Streets. Revised intersection capacity calculations based on these changes are presented in the last column of Table S-5.

Table S-5
REVISED INTERSECTION VOLUME/CAPACITY AND LEVEL OF SERVICE (PM-PEAK)

Intersection Location	1989 Existing		2010 Without Project		2010 With Project 25 MSF M3		2010 With Project 25 MSF M2		2010 With Project Revised	
	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS
<i>Internal Intersections</i>										
1. Glendale Bl & Hollywood Fwy	--		--		<u>1.01</u>	F	<u>1.00</u>	F	<u>1.05</u>	F
2. Glendale Bl & Temple St	1.05	F	1.22	F	<u>1.10</u>	F	<u>0.92</u>	E	0.94	E
3. Beaudry Av & Sunset Bl	0.92	E	1.22	F	<u>1.13</u>	F	<u>1.12</u>	F	1.04	F
4. Beaudry Av & Temple St	0.81	D	0.66	B	0.86	D	0.79	C	0.84	D
5. Glendale Bl & Beverly Bl	0.96	E	1.38	F	<u>0.86</u>	D	<u>0.82</u>	D	0.91	E
6. Figueroa St & Sunset Bl	0.80	D	1.12	F	<u>1.14</u>	F	<u>1.09</u>	F	1.09	F
7. Beaudry Av & Second St	0.91	E	0.69	B	0.86	D	0.88	D	0.88	D
8. Figueroa St & Fourth St	0.71	C	0.66	B	0.53	A	0.52	A	0.53	A
9. Figueroa St & Fifth St	0.73	C	0.98	E	0.78	C	0.79	C	0.77	C
10. Beaudry Av & Sixth St	0.41	A	0.66	B	0.81	D	0.84	D	0.85	D
11. Figueroa St & Sixth St	0.69	B	0.93	E	<u>1.08</u>	F	<u>1.09</u>	F	<u>1.19</u>	F
12. Bixel St & Sixth St	0.88	D	1.03	F	<u>0.90</u>	E	<u>0.98</u>	E	<u>1.12</u>	F
13. Bixel St & Wilshire Bl	0.73	C	0.97	E	0.90	E	0.89	D	0.96	E
14. Lucas St & Wilshire Bl	0.56	A	0.50	A	0.66	B	0.68	B	0.72	C
15. Bixel St & Seventh St	0.66	B	1.96	F	<u>1.01</u>	F	<u>1.01</u>	F	1.09	F
16. Figueroa St & Seventh St	0.52	A	0.51	A	0.96	E	0.95	E	0.95	E
17. Figueroa St & Eighth St	0.42	A	0.72	C	0.75	C	0.74	C	0.74	C
18. Figueroa St & Ninth St	0.72	C	0.60	B	0.56	A	0.56	A	0.57	A
19. Bixel St & Eighth St	0.86	D	1.51	F	<u>0.78</u>	C	<u>0.81</u>	D	0.80	D
<i>External Intersections</i>										
20. Blaine St & Eleventh St	<u>0.68</u>	B	<u>0.80</u>	D	0.76	C	0.75	C	0.75	C
21. Alvarado St & Glendale Bl	1.19	F	1.15	F	<u>1.05</u>	F	<u>1.06</u>	F	1.06	F
22. Alvarado St & Beverly Bl	0.84	F	0.90	E	0.94	E	0.85	D	0.85	D
23. Alvarado St & Third St	0.94	E	0.98	E	<u>1.01</u>	F	0.94	E	0.94	E
24. Alvarado St & Wilshire Bl	0.81	D	0.98	E	<u>1.18</u>	F	<u>1.17</u>	F	<u>1.17</u>	F
25. Alameda & Sunset/Macy	0.65	B	0.70	C	0.76	C	0.80	D	0.80	D
26. Union St & Olympic Bl	0.76	C	0.98	E	0.89	D	0.90	E	0.90	E
27. Figueroa St & Third St	0.85	D	0.96	E	<u>1.04</u>	F	0.79	C	0.82	D
28. Main St & First St	0.76	C	1.00	F	<u>1.01</u>	F	<u>1.04</u>	F	<u>1.04</u>	F
29. Alameda St & First St	0.89	D	1.00	F	<u>1.07</u>	F	0.99	E	0.99	E

(a) **Bold** indicates significant adverse project impact (increase in V/C ratio of 0.02 or greater at LOS F).
Italic indicates significant beneficial project effect (decrease in V/C ratio of 0.02 or greater at LOS F).
Source: Gruen Associates, based on DKS 1990.

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This revised analysis indicates one new impacted intersection at Bixel and Sixth Streets due to transit mall volumes and turn restrictions. Addition of a north-bound right-turn pocket on Bixel Street within the available right-of-way would mitigate this impact, improving the LOS to E (0.93).

Comment 2.g: The Glendale Boulevard transitway may require removal of on-street parking between Sunset Boulevard and the Hollywood Freeway during peak hours. If it is accomplished without widening, the reversible lane may replace either an existing lane of traffic or curb parking. Congestion implications of HOV reverse flow have not been reported on this section of Glendale Boulevard.

Response: The Specific Plan does not recommend a reversible lane on Glendale Boulevard, although such an option was analyzed during plan development. See response to Comments 15.o-15.s.

Comment 2.h: The plan nearly fully funds the HOV between 8th Street to the Hollywood Freeway and northerly. However, the flyover extension southerly to the Harbor Freeway is highly dependent on regional funds. What alternatives are available if the southerly extension is not implemented?

Response: Agreed; facilities which are recommended to address demand due to regional growth and out-of-CCW traffic generation are proposed to be funded through a greater contribution of regional funds. Nevertheless, many of these facilities and improvements form necessary links in the Transportation Specific Plan, which is funded 59% through CCW revenues, and is dependent on a 16% CBD contribution and 25% regional contribution. Funding requirements are fully defined in the plan and DEIR (p. 197), along with phasing requirements and the option of substituting feasible improvements of equivalent effectiveness.

Comment 2.i: Rideshare TDM Analysis. A major assumption of the forecast is the anticipation of increased ridesharing by those regional trips traveling through the study area. The EIR should more clearly explain these assumptions and their impact on congestion levels if they are not achieved.

Response: As stated in the EIR Project Description (p. 41) and Traffic section (p. 175), the MT3 level of mitigation proposed as the basis for the Transportation Specific Plan is founded on the coordination of transit improvements and parking limitations with the development, implementation and monitoring of employer TDM plan. As noted in response to Comment 2.b, the transportation facilities of MT2 less-effective level of TDM provides a fall back, should ridesharing and other TDM actions not prove as effective as planned. The draft Specific Plan Ordinance (section 12.D.3.c) includes non-compliance penalties of triple

III. Response to Comments

the plan's trip fee ($3 \times \$16,500 = \$49,500$) to ensure enforcement.

Comment 2.j: Study Area TDM goals are dependent on parking policy and transit improvements. The goals are appropriate for the Plan but impacts should be evaluated assuming that they may fall short. These goals appear ambitious in that they anticipate a reduction in the use of single occupant vehicles from 75% to 45%. If the transit improvements are not implemented the final EIR should describe how these TDM goals will be achieved.

Response: See response to Comment 2.i.

Comment 2.k: PM Peak Hour Shift. The reported impacts assume that staggered work hours and flex-time can be used to spread the projected traffic over several peak hours. The EIR should demonstrate the availability of capacity in the adjacent hours. Which scenarios should be reviewed? Examined from this conservative viewpoint, what is the impact on rideshare if important transit improvements are not implemented?

Response: The DEIR presents existing traffic distributions by time of day in Figure 31 (page 162). These figures demonstrate the availability of surface-street capacity in all off-peak hours, and the availability of freeway capacity in adjacent early morning and late evening off-peak hours. If programmed transportation improvements are not implemented, development will not be permitted to extend beyond the phase for which such improvements were scheduled.

Comment 2.l: Improvements Requiring Caltrans Approval and/or Funding. The following types of improvements proposed by the plan require Caltrans approval, cooperation and a share of the funding: Bixel Street flyover to the Harbor Freeway HOV; Various new on/off-ramps; One-way street reconstructions in conjunction with ramp modifications; Freeway widenings.

Response: Such review is underway; Caltrans support of specific improvements would require state Project Study Reports and environmental documentation prior to approval. See response to Comment 2.d.

Comment 2.m: Boylston Street Extension. The proposed alignment is essential for direct access to the proposed 7th Street Harbor Freeway on/off ramps, but the easterly alternative alignment requires Caltrans owned right-of-way that may not be available, while the westerly alignment has a conflict with a proposed office building development. What is the impact on the plan if the extension of Boylston Street to 7th Street as a new designated major highway is not implemented? What alternatives are available?

Response: As with each of the improvements proposed under the Transportation Specific Plan, this facility would be approved through

III. Response to Comments

adoption of the Specific Plan package, pursuant to review by Caltrans as a responsible agency. The improvement is necessary both to provide access to the CCW area and to relieve conditions for local traffic on the Harbor Freeway and its parallel arterials. Boylston Street is proposed to be improved to a major arterial with three lanes in each direction between First and Seventh Streets. This involves extending Boylston south from Sixth Street to connect with Wilshire Bl, Seventh St, and new Harbor Freeway ramps. This arrangement provides for a major entry corridor to CCW from the southbound Harbor Freeway, as well as for local access and circulation to and from the CBD.

Comment 2.n: Adequacy of Phasing. The DEIR reports mitigation proposed by phase, but it does not report the impacts by phase nor the adequacy of the measures for each phase. The phasing plan should include a required average vehicle ridership (AVR) goal within the study area and a method of adjusting the on-site TDM program if AVR goals are not being met.

Response: On the contrary, the DEIR outlines the phasing of improvements in the Project Description (pages 40-41), and assesses the adequacy of capacity improvements by phase by screenline in Table 35 (page 190).

Comment 2.o: The phasing plan should also acknowledge the recently enacted AB 471 which will require the County to prepare and implement a Congestion Management Program (CMP), provided that voters approve Proposition 111 in the June, 1990 election. Full implementation of the CCW plan may be dependent on the area's ability to meet CMP goals.

Response: The CCW Transportation Specific Plan goes beyond CMP requirements by explicitly addressing the impacts of through traffic, and by requiring mitigation of impacted intersections as opposed to the ability to offset impacts through mitigation of nearby intersections under the CMP. The integrated approach of the Specific Plan in implementing regional facility improvements, local roadway and ATSAC measures, transit and TDM programs will serve as a model for regional CMPs in response to the legislation proposed under SCA-1.

Comment 2.p: Mitigation of Cumulative Impacts. DOT is having meetings with Caltrans and other agencies to discuss additional improvements in view of the cumulative impacts reported for this and other related projects. The Final EIR should discuss the relationship of the plan to any of these measures.

Response: The Transportation Specific Plan has been designed to address the issues of within-CCW and cumulative growth in traffic and congestion,

III. Response to Comments

as noted in response to Comment 2.a. Many improvements noted in Caltrans' *Long Range Circulation/Access Objectives for Downtown* (April 17, 1990) are included in the CCW Specific Plan, such as the Harbor Freeway Transitway and Alameda Bypass. Should additional measures be identified for mitigation of the cumulative effects of development, they should be assessed for consistency with the adopted Specific Plan.

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3. **Commentor:** Tony Ennis, Assistant Bureau Commander
Bureau of Fire Prevention, LA Fire Department

January 16, 1990

Comment 3.a: All items appear to have been addressed adequately at earlier levels of review.

Response: Comment acknowledged.

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4. **Commentor:** Garrett W. Zimmon, Captain
Planning and Research Division, LAPD

February 5, 1990

Comment 4.a: The Draft Environmental Impact Report (EIR) for the Central City West Specific Plan has been reviewed. The Los Angeles Police Department agrees with the findings and recommendations regarding police services as stated within the report. It is requested that a copy of the Final EIR be sent to the Department for future reference.

Response: Comment acknowledged.

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5. **Commentor:** Edward Karapetian, Manager
Environmental and Governmental Affairs, DWP

December 18, 1989

Comment 5.a: Electric service is available and will be provided in accordance with the Los Angeles Department of Water and Power's "Initial Study and Checklist", implementation of the Specific Plan would result in changes to the existing land use and zoning designations, entitlements, phasing, and related regulations. It is not possible to make specific comments without knowing what street realignments and what sizes and locations of new developments may be permitted by the Specific Plan. It is expected, however, that additional distribution facilities will be required to supply the area as it develops. Facility construction in the form of unavoidable noise, air pollution, and traffic congestion during construction.

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Response: Conceptual design, sizing and funding of utility improvements will be undertaken upon completion of the Specific Plan. As part of the required Permit Review Process, new facilities may be required as development comes on line. This may be required of individual developers or through the CFD/LDC (described as the Community Development Corporation in the DEIR, pages 42-44).

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6. **Commentor:** Norman E. Nichols
General Manager and Chief Engineer, DWP

February 16, 1990

Comment 6.a: The Department will provide further input to the Planning Department concerning the proposed water recycling and dual plumbing requirements. While the Department strongly encourages the use of recycled water, we need to better understand what is being proposed, particularly given the likely opposition of the Health Department.

Response: Comment acknowledged. Dual plumbing is a design issue; Ordinance requirements for dual plumbing are intended to allow for use of this capability as procedural opposition is overcome.

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7. **Commentor:** Walter W. Hoye
Engineer of Design, DWP

February 27, 1990

Comment 7.a: Increases in water use of 114 percent (a total usage of 5.5 MGD) by the year 2010 and 160 percent (a total usage of 6.7 MGD) by buildout, along with required fire flows of 12,000 gpm to any block in the study area, will require enlarging of water mains in the specific plan area and the surrounding communities. Approximately 14,700 feet of 8- to 12-inch pipe will need to be enlarged to 16 to 20 inches. In estimating future water consumption, an assumption of an average landscape water savings of 40 percent may be optimistic.

Response: See response to Comment 5.a. Water savings estimates of xeriphytic landscaping are derived from LADWP public information.

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8. **Commentor:** Robert J. Niccum, Director of Real Estate
Los Angeles Unified School District

February 16, 1990

Comment 8.a: It is imperative that the Draft Environmental Impact Report (DEIR)

III. Response to Comments

provide school planners and the public reliable and unambiguous information as to the adequacy of the current school facilities, the status of the District's building program in this area, and the impact that this project will have in terms of generation of additional students, and in terms of providing incentives for school facilities to serve these students.

Response: Agreed.

Comment 8.b: In December, 1989, the DEIR consultant asked us to provide comments on the pre-draft text of the School Section of the DEIR (see attached letter). Though we had many concerns about methodology, inaccuracies, and omissions, several of these concerns were apparently disregarded. We therefore restate them here; together with our other general and specific comments. Section G.3 "Schools" does not provide a clear and accurate description of the project's impact. We question the methodology used, and the reasons for including Table 57 - Existing Student Demand. The fact that there may be 740 elementary school children currently living within the Specific Plan area is not only irrelevant; it is distracting to reviewers of the document who are trying to learn what the project's impact will be on the area's schools. It is, besides, incorrect (see comment below).

Response: On the contrary, the Schools section of the Environmental Impact Report (pages 269-276) is intended as a source of definition of existing conditions in the project area, assessment of project impact, analysis of cumulative impact, recommendation of potential mitigation measures, and discussion of resultant net effect. The section presents several perspectives regarding existing conditions to provide a context for discussion of impacts: existing educational resources in terms of school facilities and capacities, existing student demand estimated from household data, and the existing policy setting within which education resources are provided. Existing student demand levels estimated in Table 57 (page 275) are presented for comparison with Specific Plan "with project" forecast levels in Table 58 (page 276) as a basis for understanding the gross and net incremental impact.

Comment 8.c: The purpose of this environmental analysis in regards to schools should be to determine the impact of the project, and the additional students it generates, on the existing school infrastructure. The accepted methodology for estimating this impact is to provide a table showing the existing enrollments and capacities of the schools serving the project area (this table has been provided - Table 56), then to provide a table showing the students to be generated from the proposed additional units (this table has been provided, but needs revision to be accurate - see comment below). A third table should add the numbers of students generated to the existing enrollments in the first table, and calculate whether the schools will then be over or undercapacity, and by how much. In addition, there should be a fourth table which provides the same information

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for the cumulative impact analysis. If samples of such tables are needed, please let us know and we will provide them. However, samples can be found in the recent Porter Ranch Specific Plan EIR, and in numerous others for which the City is lead agency.

Response: The reason why the methodology described above is not applicable to this Specific Plan EIR is that the Specific Plan Area, the cumulative impact study area, and the catchment areas of the various schools all overlap each other and cannot be cleanly added up. In addition, travelers (as shown in Table 56, page 273) are transported in and out of the area, further fuzzing the geographic units. The CCW Specific Plan has a further distinction from the type of "project" impact analysis described by the commentor: the plan will not just add dwelling units, but will replace dwelling units with new units which may house different sizes and types of households - where a different mix of student generation factors are applicable. These complications were less of a problem in the Porter Ranch Specific Plan analysis, where school service areas more neatly corresponded to the larger specific plan area.

Comment 8.d: Table 58 does not clearly identify the numbers and types of units proposed by the Specific Plan. Most tables of this type do provide this information, and it enables reviewers to check the accuracy of the calculations and assigned generation factors. The generation factors assigned in this table seem to be for single family and townhouse units, as opposed to rental units. Will there be no rental housing available in the Specific Plan area? How many of each type of unit is planned? Please correct the generation factor under the category Low Income - 2 bedrooms. It should be 0.3, not 0.03.

Response: The Schools section (p. 273) states that the 12,000 units projected under the Specific Plan are estimated to be two-thirds standard income and one-third very-low and low income for the purposes of applying student generation factors. The calculations correctly used the 0.3 students-per-unit factor for low-income 2-bedroom dwellings; the 0.03 is a typo in the table.

Comment 8.e: The same correction should be made to Table 57; generation factor of 0.03 should be changed to 0.3. Also on Table 57 please correct the factor under Multi Family, Low Income, 3+ bedrooms. It should be 0.2, not 0.02. However, since the types and numbers of units are not clearly identified, it is possible these factors are too low. Since the DEIR text indicates that 99% of the existing units are not owner occupied, please re-check the generation factors which are used here - they should perhaps be .25 and .6 for 2 and 3 bedroom units, respectively. Attached is another copy of the District's Table of Student Generation Factors.

Response: Again, the calculations correctly used the 0.3 and 0.2 students-

III. Response to Comments

per-unit factors; the 0.03 and 0.02 are typos in the table and were not used in the calculations. The DEIR in Table 15 (page 124) states that existing absentee ownership averages 96% within CCW: 88% in the area north of First Street with more single-family dwellings, and 99% in the area south of First Street, where residences are predominantly multi-family. The DEIR applied the single-family and townhouse (multi-family) rates appropriate to each income group consistently.

Comment 8.f: Most alarming to us is the Specific Plan's proposed routing of Fourth Street directly through our new elementary school site. The Los Angeles Unified School District is well into the process of providing a our Belmont New Elementary School #5 at the southwest corner of Third and Lucas Streets. We have acquired the parcels, finalized the architectural plans, are currently doing preliminary site work, and are about to go out to bid on the construction. This school is urgently needed to alleviate the other elementary schools which serve the Specific Plan area, which are among the most severely overcrowded in our School District. The routing of Fourth Street through our school site would make it impossible for us to build this school, and would be a further exacerbation of the problem facing the School District in providing school facilities in the area. The DEIR needs to address that adverse impact and propose mitigation measures if any are available.

Response: On the contrary, the Specific Plan team has been working with the School District representative for the CCW area to ensure that the alignment of Fourth Street can be accommodated in the design of the proposed school facility, and vice versa. In meetings with the School District's architects, a plan had been discussed which would depress the Fourth Street alignment, taking advantage of the grade difference between Lucas and Witmer, allowing the school's buildings and/or its playing fields to bridge over the depressed roadway.

Without this roadway connection, the Third-Fourth one-way couplet would end abruptly at Lucas Street. Eastbound traffic on Third Street would be required to turn right onto Lucas and then left onto Fourth Street to reach the CCW and CBD areas. This alternative could be accommodated if the School District is required to dedicate additional right-of-way along Third Street between Witmer and Lucas, and along Lucas Street between Third and Fourth Streets (with appropriate transitions). This additional 8-10 feet of right-of-way would be necessary to provide an additional travel lane in these two one-block segments. With these additional lanes, the intersections at Third & Lucas and Fourth & Lucas would operate at LOS C, as opposed to LOS B with the diagonal connection proposed in the Specific Plan. This would be an acceptable alternative, though it would create a more circuitous route for CCW and CBD-bound vehicles.

III. Response to Comments

Comment 8.g: The DEIR contains a rather glaring defect in its discussion of mitigation measures for school overcrowding. The DEIR acknowledges at pages 18 and 269 through 274 that the adoption of this specific plan will exacerbate already serious overcrowding conditions in the area. As its principal "mitigation measure," however, the DEIR offers the following: "Developers should assist in identifying land that could be used for school construction." (DEIR, page 18, 274). The DEIR states that this measure was suggested by School District staff; this is not the case. District staff suggested that the City of Los Angeles assist in identifying land that could be used for the construction of schools. Though we previously asked the EIR consultant to correct this misrepresentation, (see our letter of December 18, 1989), this was not done. Also ignored was our request that the sites which are identified by the City be included in the EIR. We still ask that this be included as a mitigation measure.

Response: On the contrary, the DEIR states that the principal mitigation measure to address existing and future school overcrowding will be the currently-required developer fees on residential and commercial projects of \$1.56 and \$0.26, respectively. These fees would total some \$25,000,000, and come from fee levels which are based on the incremental cost of added demand for school facilities from each square foot of development. Although the City School District has the authority of eminent domain for acquisition of school sites, the DEIR includes mitigation to involve the proposed CCW Community Facilities District in coordination and assistance. School sites proposed by LAUSD were cited in the text of the DEIR (page 272).

Comment 8.h: In respect to the mitigation measure depending on developers, we wish to point out that to satisfy the requirements of Public Resources Code Section 21081, mitigation measures must be changes or alterations which "have been required in, or incorporated into" the project. The measures may be those adopted by the agency itself or those that fall within the jurisdiction and responsibility of "another public agency." CEQA does not permit the City of Los Angeles to "pass the buck" on this problem by relegating the School District to reliance upon the altruism of private developers who will benefit from the plan. Unless the City adopts measures that compel, or at least strongly encourage, the hoped for "assistance," it has completely defaulted on its responsibility to address this adverse environmental effect.

Response: On the contrary, the developer fee is - and the Community Facilities District will - be City requirements which are not optional for individual developers. In addition, certain CCW developers are currently expending funds to provide residents with affordable housing to replace existing housing that the LAUSD will acquire through eminent domain for a new junior high. Implementation of these measures will be evaluated and reported through the project's Mitigation Monitoring Program.

III. Response to Comments

Comment 8.i: The DEIR is wholly silent on another adverse environmental effect of the plan in the area of school overcrowding. Although the plan acknowledges that the adoption of the specific plan will add pupils to the area, thereby making more acute the need for the School District to acquire property for school construction, it does not appear to address the fact that the adoption of this specific plan will make such land acquisition more difficult because by encouraging office and residential developments, it will make available land for schools more scarce, and will probably dramatically increase the value of any available property.

Response: On the contrary, land values in the CCW area are already extremely high; as a result of the downzoning allowable development levels as was done under the Specific Plan (the plan reduces densities by 42%), land values would be expected to be impaired rather than raised.

Comment 8.j: The DEIR identifies as an additional mitigation measure for school overcrowding the fact that development fees will be payable to the School District. The DEIR does not quantify the total amount of funds anticipated to be available from these fees, however, nor does it attempt to compare those funds with the total sums likely to be required for the needed new school construction. Finally, there is no attempt made in the DEIR to compare the date when funds would be available to the date or dates when school construction would have to commence. It is obviously of little value to the school district to receive monies in the year 2000 if the schools have to be built tomorrow.

Response: Developer fee rates are stated twice in the Schools section (pages 273 and 274). An estimate of the total would be some \$25 million under the 25 MSF cap. These fees are payable at time of application for building permit - at least two years before occupancy - allowing for use of the fees for expansion of needed facilities as currently planned.

Comment 8.k: On page 18 and page 274 the DEIR recites that adverse effects on schools "would be reduced to an acceptable level" if the proposed mitigation measures were adopted. For the reasons set forth above, that statement is dubious at minimum. In any event, there is certainly no explanation in the DEIR as to what the authors believe is an "acceptable level" of adverse impact, nor is there any discussion as to how that "acceptable level" would be obtained by the mitigation measures recommended.

Response: The City has set school fee levels based on the incremental cost of growth; therefore, the fees collected should be adequate to mitigate the impact of growth on school development. Unfortunately, the commentor has not suggested either a criterion for determining significance of impacts nor an alternative threshold for determining

III. Response to Comments

adequacy of mitigation. The DEIR stated that the project's added student demand would be a significant adverse impact, and that revenues towards alleviating overcrowded conditions and additional coordination with the Community Facilities District would mitigate impacts on schools to non-significant. Additionally, the comment does not acknowledge the developer-financed replacement housing, at a cost of some \$6-7 million, being constructed to benefit residents impacted by LAUSD eminent domain actions.

Comment 8.l: Please make corrections to the second paragraph on page 272, as requested in our letter of December 18, 1989. The text should read: "In order to address the overcrowded elementary schools and plan for an increasing school age population, the Los Angeles Unified School District is in the process of assembling sites to develop three new elementary schools. The planned Belmont New Elementary School No. 5, to be located on 3rd Street and Lucas Avenue, is proposed to have 22 classrooms and nine bungalows, with construction tentatively scheduled for 1991. An August 7, 1989 decision by the Los Angeles School Board may result in the construction of a junior high school, at the southwest corner of Temple and Beaudry Streets. A second new elementary school, Belmont New Elementary School No. 3, is to be located at 7th Street and Union Avenue, immediately west of the Study Area 1 boundary, and is also scheduled for completion by 1991. A third school, Belmont New Elementary School No. 4, to be located farther west on Olympic Boulevard and Magnolia Avenue is scheduled for construction by 1990. In addition,"

Response: The paragraph in the DEIR (p. 272) incorporates the information as requested by the School District in its letter of December 18, 1989.

Comment 8.m: The School District has also recognized the need to establish an additional junior high school and high school to alleviate conditions existing at Virgil and Berendo Junior High Schools and Belmont High School. The District has identified a site for a junior high school at Boylston, Colton, Beaudry, and Temple Streets in the Temple Beaudry area, and is currently doing a feasibility study. This is the Preferred Alternative Site, provided that an agreement suitable to the District is negotiated with third parties for the provision of replacement housing for residents who would be displaced by the project. Alternative sites are also under study for the Belmont Junior High School No. 1. One of these sites is to the south of the preferred site, and another is in the Crown Hill area. Site plans of these three study areas are attached. The District is currently conducting feasibility studies on sites outside the area for a new high school. If one of these sites is found to be appropriate, it would benefit students in the Specific Plan area.

Response: Comment acknowledged.

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Comment 8.n: Figure 38 on page 183 of the DEIR indicates a reconfiguration of 4th Street which is inconsistent with other renderings in the revised preliminary Central City West Specific Plan.

Response: Figure 38 of the DEIR (p. 183) is intended as a schematic representation of proposed local transportation improvements. See response to Comment 8.f.

Comment 8.o: Section 15146 of the State CEQA Guidelines states the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR. The Revised Preliminary Central City West Specific Plan lists the street widenings, but the EIR does not identify the impacts nor suggest mitigating measures. What will be the impact on the Downtown Business Magnet of the widening of the Hollywood Freeway, and of the proposed on and off-ramps at Beaudry, in terms of noise and air emissions? We are especially concerned about the proposed street widening and setbacks at Witmer Street (near 3rd Street), adjacent to our Belmont New Elementary School #5; the proposed street widening and setbacks are in conflict with the existing plans and they will be very difficult to resolve.

Response: The DEIR (p. 194) has indicated the extent of right-of-way acquisition necessary to development of the proposed transportation improvements and incorporates more detailed information through reference to the Specific Plan. Further, the City has held several meetings with Mr. Eugene Werner of LAUSD to resolve any potential conflicts.

Comment 8.p: It would be helpful to us if the EIR were to identify the proposed road width and setbacks of streets which will be improved adjacent to our schools. Other streets for which we would like details are Lucas Street (near 3rd Street); Beaudry Street and Boylston Street, between Colton Street and the Hollywood Freeway. Would Union Street be widened south of Wilshire? We also request details on the station proposed for the intersection of Glendale-Beverly-First-Second Streets, and details on the proposed peripheral parking area at this location.

Response: The School District, like any property owner in the CCW area, is invited to consult with the City Planning Department staff to obtain any additional information regarding proposals adjacent to or in the vicinity of a specific parcel beyond that information included in the Specific Plan and Draft Ordinance. Specific Plan widenings are noted in the Specific Plan - Streetscape Section.

Comment 8.q: The EIR on page 51, under Land Use Policies, calls for retail or similar community uses along the south side of Third Street. We ask that this sentence be revised to reflect school use, as this is the site of the Belmont New Elementary School

III. Response to Comments

#5. The next sentence, "Encourage LAUSD to continue rail uses at first floor level at new elementary school at Third Street." should be omitted, as this would seriously impede our ability to provide a school at this location.

Response: Agreed; the Specific Plan has been revised pursuant to LAUSD comments.

Comment 8.r: On page 52, the EIR recommends coordination with LAUSD to develop a mini park at Witmer Street. This will be possible if there is no street bisecting our school site. The School District welcomes joint planning so that its playgrounds and facilities can also be enjoyed by community residents. In regards to the plan for mini-parks in the Temple Beaudry area, it is possible that, should a junior high school be built there, the school playground will satisfy some of these goals.

Response: Agreed; see response to Comment 4.f.

Comment 8.s: Because we would like to know all details of the ambient noise measurement tests which were taken at the Downtown Business Magnet High School, Belmont High School, Tenth Street Elementary School, and also at (or near) our site for Belmont Elementary School #5 (Third Street, near Witmer), we would appreciate it if you could send us the full results. We would also appreciate receiving the full analysis of the air emissions at these four locations. The DEIR states that implementation of the Specific Plan will lead to reduction of noise and air emissions at three of these locations. We request, however, that you include in the mitigation measures a provision for periodic testing of noise and air emissions at these four sensitive receptor sites, and a duty to mitigate the noise and air emissions if, contrary to the DEIR predictions, they increase substantially and to above the normally acceptable levels, thus adversely impacting the health of the students and staff, or the learning environment in the classrooms. We are especially concerned about air emissions and noise if traffic bisects or tunnels under the Belmont New Elementary School #5.

Response: Noise logging dosimeter printouts for school locations tested will be transmitted to LAUSD as requested.

Comment 8.t: Stationary-source air quality is not discussed in this DEIR. Are there facilities in the Specific Plan area which now emit hazardous or acutely hazardous air contaminants? If so, it would be helpful for planning of school and other developments if the DEIR could identify the number and location of these facilities. In addition, page 329 indicates that there will be limited expansion of industrial uses in the Eighth/Ninth Street district. What impact will this have on air quality? Will these facilities be within a quarter mile of existing or planned school facilities, such as our planned Belmont New Elementary School #3 at 7th Street and Union Avenue?

Response: Stationary-source air quality was not included in the scope of

III. Response to Comments

the EIR based on the CEQA Initial Study determination (DEIR pp. 2-3) that the proposed uses do not present any major new point sources of air pollutants. Industrial uses would decline from existing under the 25 MSF Specific Plan (DEIR p. 32).

Comment 8.u: The DEIR, in its section on Traffic Safety at page 173, lists a few locations that experience an above average number of accidents. It states: "Higher than average accidents at these locations occur for different reasons. For instance, accidents at Temple/Edgeware and Eighth/Columbia seem to be related to the curvature of the east-west roadway alignment which results in accidents caused by lane violations." The proposed routing of Fourth Street would result in a similar curvature adjacent to Belmont New Elementary School #5, and perhaps a higher than normal risk of accidents, at intersections and areas frequented by schoolchildren.

Response: Lane violations present a risk motorist as opposed to pedestrian schoolchildren. To ensure pedestrian safety for schoolchildren, the DEIR (p. 274) recommends mitigation consisting of monitoring and coordination by the Community Facilities District and LAUSD.

Comment 8.v: Because much of the on-street parking will be eliminated in the Specific Plan area, we want to be assured that areas which we currently use for bus loading and unloading are still available to us. For bus loading, in particular, the busses [sic] will need to be parked for approximately 25 to 30 minutes. Bus unloading is quicker.

Response: Comment acknowledged.

Comment 8.w: We will need to maintain our loading zones at Plasencia School, on Edgeware, and at 10th Street Elementary, we need to use the east side of the school for loading and unloading. At the Downtown business Magnet, almost the entire student body arrives and leaves by bus. We need to maintain our loading zones on Beaudry Avenue. In addition, several of our busses [sic] park on the east side of Beaudry, from Temple to Sunset (including under the freeway) during the school day.

Response: Comment acknowledged. Please note that the City of Los Angeles requires permits for school bus parking, and that such permits will be reviewed in the context of the Specific Plan.

Comment 8.x: The DEIR contains different, and inconsistent, projections with respect to the new students to be expected by reason of the adoption of the proposed project. On page 274 of the DEIR there is an estimate of 1,726 new students. On page 18 there is an estimate of 1,925 new students. Obviously, these numbers need to be corrected, and reconciled.

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Response: Agreed; the numbers in the Summary Table (p. 18) were not revised to reflect the updated analysis presented in the Schools section (p. 274). The Schools section presents the correct numbers: 873 elementary + 426 junior high + 426 high school = 1,726 total students.

Comment 8.y: We note that several of the tables do not take into account that there will be increases in institutional uses. If the number of units in this area is to almost triple, the students generated by this project must be accommodated, and these tables should reflect the fact that additional school facilities will be build. Please revise tables 2, 67, 68, 71, among others.

Response: Institutional uses would not increase overall, since there may be a trade-offs among government, medical, school, library uses, etc., as noted in the DEIR (p. 32).

Comment 8.z: As an overall impression, it appears that no serious attempt has been made to address the adverse impacts on schools that will follow from the adoption of this plan. Of the mitigation measures described, one - the developer fees - is already mandated by existing state law; and the other - the hoped for private developer assistance - is an appeal to charity and is not a true response by the City to the problem that it is helping to create. In short, the DEIR evidences a total unwillingness on the part of the City of Los Angeles to come to grips with, and to make hard political decisions necessary to deal with, the pupil population problems that it is dropping in the lap of the School District.

Response: See response to Comment 8.k.

Comment 8.aa: We look forward to major revisions in the DEIR, so that the School District and the community can fully comprehend the impacts of this proposed Specific Plan on the School District's current facilities, and on the facilities it will need to build to better serve the project area in the years ahead. We hope for clarification of many of our concerns, and for mitigating measures for the many serious adverse impacts of the Plan. We specifically need mitigating measures which will facilitate our building Belmont New Elementary #5, and the planned Belmont Junior High School. Enrollment statistics document the critical need, and concerns voiced at the Neighborhood Workshop reflect the overwhelming support of the community for these new schools. We look forward to working with the City to ensure that the need for school infrastructure will not be sacrificed in the quest for a viable balance between jobs and housing.

Response: As no major revisions to the DEIR have been suggested, the impact analysis and mitigation recommendations continue to support LAUSD efforts to site expansions of educational facilities in the area.

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III. Response to Comments

9. **Commentor:** Bradley Smith, Division Engineer
Wastewater Program Management Division

March 1, 1990

Comment 9.a: General. The D/EIR raises questions of significant concern to this Division with respect to conformity with the Jobs/Housing Balance objectives of the Regional Growth Management Plan. According to the document, implementation of the Specific Plan would "...continue the exceedances of SCAG policy levels of 1.83 for the Central Los Angeles Subregion." (Page 148, paragraph 5, second sentence.) While the resultant Specific Plan's effects would be a marked improvement over existing build-out entitlements (6.56 jobs per dwelling unit for the Plan vs. 15.7 jobs per dwelling unit for entitlement build-out) it is not clear how conformity with the AQMP can be accomplished. Conformity with the AQMP is a concern of this Division as failure to receive a determination of conformance could impact future renewals of National Pollution Discharge Elimination System (NPDES) permits for all of the Hyperion Service Area wastewater treatment plants.

Response: City discussions with SCAG and AQMD regarding this issue confirm that the key issue is not the ratio of jobs-to-housing, but the resultant effect on travel and air quality. SCAG, through its Implementation and Monitoring Working Groups, is defining VMT equivalents for evaluating and reporting conformity with the AQMP. The Specific Plan's aggressive TDM, parking limitation, HOV facility and transit facility components ensure conformity based on this approach. See response to Comments 15.a-15.i regarding conformity with SCAG plans.

Comment 9.b: We are also puzzled by the statement: "The proposed Specific Plan would result in a net beneficial effect on the maintenance of jobs-housing balance in the Central City West area ... compared to development ... under the existing community Plan for the area. (Page 149, second paragraph.) If this is true, why is this effect listed within a section entitled Adverse Effects? Moreover, if the existing jobs-housing ratio is out of balance and the proposed Specific Plan admittedly makes conditions in this respect worse how can jobs-housing balance be deemed to exist at any time? If, in fact, job-housing balance is projected to never exist, how does the Specific Plan claim a beneficial effect?

Response: The DEIR sets out to draw a conclusion regarding the project's net effect in the Adverse Effects section; this evaluation concludes that the project would be better than the existing policy direction.

Comment 9.c: Specific. On page 306, second paragraph, first sentence; that portion of the sentence which refers to "420 MGD" should be deleted.

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Response: This boilerplate information regarding the historical context of HTP has been and is being routinely provided by the Environmental Review Section for inclusion in EIRs.

Comment 9.d: On page 306, third paragraph, last sentence; the reference to a lack of capacity of the trunk lines of the City of Los Angeles should be deleted.

Response: See response to Comment 9.c.

Comment 9.e: On page 307, section entitled "Sewer Demand Management;" the entire section erroneously discusses a response by the City to a "sewer" capacity shortage within the Hyperion Service Area (HSA). The City's development of the Allocation Ordinance has been necessitated by a projected shortage of Treatment Capacity within the HSA. For the most part, sewer capacity is adequate throughout the HSA to receive new flows without limiting new connections. Notwithstanding, local conditions of sewer inadequacy do exist and the area effected by the proposed Specific Plan is projected to reflect a condition of sewer shortfall in the very immediate future. Studies are presently underway to identify projects needed to provide sewer relief within the Specific Plan area.

Response: See response to Comment 9.c.

Comment 9.f: Within the second paragraph, third sentence; the reference to "sewer capacity" should be changed to "system treatment capacity." This entire paragraph is somewhat misleading and could benefit from a complete revision. The reference to a "permanent ordinance" should be changed to "replacement ordinance."

Response: See response to Comment 9.c.

Comment 9.g: On page 307, section entitled "System Improvement Plans," second sentence; the phrase "designed to stop discharging sludge into Santa Monica Bay" should be deleted. The HERS was constructed for the purpose of making beneficial use of a portion of Hyperion sludge through the production of electrical energy. While it is true that sludge discharges to Santa Monica Bay have ceased other sludge disposal and reuse alternatives are utilized by the City to manage the bulk of Hyperion sludge material.

Response: See response to Comment 9.c.

Comment 9.h: On page 308, first paragraph, last sentence, the reference to two outfalls should be clarified. Hyperion Treatment Plant's normal mode of operation provides for discharge of all treated effluent through the five-mile outfall. During periods of unusual plant operation (primarily peak wet-weather flows coinciding with effluent pumping plant power outage) discharge of a portion of the plant's effluent is also accomplished via gravity through the one-mile outfall.

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Response: See response to Comment 9.c.

Comment 9.i: On page 308, second paragraph, last sentence; the word "other" should be struck and the word "order" substituted.

Response: Agreed.

Comment 9.j: On page 309, first paragraph, last sentence; the word "sludge" should be struck and the word "influent" substituted.

Response: Agreed.

Comment 9.k: On page 309, second paragraph; the word "sewer" should be struck and the word "treatment" substituted in the fourth and seventh sentences.

Response: Agreed.

Comment 9.l: On page 311, section entitled "Cumulative Impacts;" the need for an additional major sewer, in or near the Specific Plan area, to serve projects currently in the pipeline is clear at the present time. Capacity (treatment system) limits are not expected to adversely impact proposed projects after 1992.

Response: Comment acknowledged.

Comment 9.m: On page 311, section entitled "Mitigation Measures," discussion of first three sentences; the measures described are merely compliance with existing City regulations and as such do not constitute mitigation measures. Also, the document should point out that the impacts and mitigation opportunities associated with construction of additional lines to serve specific projects should be thoroughly discussed in individual project environmental documents.

Response: Agreed; however, compliance with code-required mitigation is required as mitigation.

Comment 9.n: It is not clear why the requirement to install dual plumbing is confined to non-residential structures. Given the number of mixed-use and multi-residential structures, presently proposed within the Specific Plan, opportunities would seem to exist for a more widespread practical use of dual systems.

Response: The cost burden of dual plumbing in subsidized housing is considered undue.

Comment 9.o: On page 311, section entitled "Adverse Impact," the last sentence; the

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term "acceptable levels" is vague and subjective.

Response: The DEIR (p. 311) identifies project impacts as cumulatively significant and concludes that even with recommended mitigation, the project would continue to significantly impact sewer and treatment system capacity. Absent suggestion of a threshold criteria level from the commentor, these impacts and mitigation conclusion stand.

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10. Commentor: Alonzo A. Charmichael, Planning Officer
Department of Recreation and Parks

March 1, 1990

Comment 10.a: One of the first references to parks in the document occurs in the "Summary of Project Effects" ("Environmental Impacts") on Page 19. Here, the total of eighteen (18) acres of needed park space is noted, along with additional acreage that is proposed for development with specific projects. We strongly suggest that at least one site of from five to ten acres be set aside so that facilities may be provided for cultural programs, team field sports, large group picnic areas and, ultimately, a community building for year-around recreational programming. We would think of such a facility as "Central City West Recreation Center".

Response: The existing playing fields at the northwest end of the study area (the southern tip of Echo Park) in addition to the bulk of Echo Park immediately adjacent to CCW (and especially to the Temple-Beaudry residential neighborhood) provide the large community park resource described in the comment. The parks called for under the Specific Plan (DEIR pages 284-287) are intended as neighborhood parks under the City categorization scheme, to support the urban village character of CCW districts and neighborhoods developed under the Specific Plan. In addition, a shared use program is planned for the new junior high school planned for Temple-Beaudry.

Comment 10.b: The plan includes a number of references to mini-parks, beginning with the "Parks and Open Space" section on Pages 33 and 34. We have serious reservations about the value of mini-parks in the 1990's. Very small parks located between or immediately adjacent to residential or commercial structures have tended to become nuisances for residents of the buildings. Mini-parks are disproportionately expensive to maintain. This agency no longer seeks the acquisition of mini-park sites. We would suggest that a number of the proposed mini-parks be consolidated into a more meaningful open space area for residents of Central City West.

Response: The two-acre parks proposed will improve park access within the context of an area which is relatively self-contained as it exhibits a

III. Response to Comments

good job-housing balance. By clustering mini-parks in the small CCW area, the support responsibility and cost would be roughly equivalent to the situation where these mini-parks were combined into one or two larger parks. Notwithstanding the above information, however, it is acknowledged that the Department of Parks and Recreation has the authority to establish the priority of such facilities and it is anticipated that the Department would so act over the implementation of the Plan.

Comment 10.c: The concept of the "Community Development Corporation" is first referenced on Page 43. The plan suggests that the Corporation purchase and dedicate land for public parks and develop public parks and open space improvements. We applaud the basic concept. However, if new park land is to be dedicated to the City of Los Angeles prior to development, the City Charter would require that the land be accepted by the Board of Recreation and Park Commissioners and that actual park construction be managed by this Department rather than by the Corporation. This section may require some re-working. We'd be glad to help.

Response: Agreed.

Comment 10.d: The management of Quimby fees by the Corporation is suggested on Page 44. Quimby fees are under the jurisdiction of the Board of Recreation and Park Commissioners.

Response: See response to Comment 10.c.

Comment 10.e: The acceleration of Quimby fee payments, referenced on Page 288, would require an amendment of the Municipal Code unless owner/developers could be convinced to voluntarily make early payments, not only for future fee credits but also, perhaps, to avoid future increases in fees.

Response: Agreed; such a mitigation approach could be implemented through the Community Facilities District or through a Code amendment with adoption of the Specific Plan.

Comment 10.f: The "Parks and Open Space Policies" (Page 47) suggests that Plasencia Elementary School be improved and that at least some maintenance of the facility be assumed by this Department. We would be unwilling to automatically assume this maintenance responsibility in the absence of an appropriate budget increase for this purpose or an agreement with the LAUSD whereby the District would fund our maintenance of the site.

Response: Agreed.

Comment 10.g: The terms "Public/private plaza" and "public/private mini plaza" appear

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on Page 50, together with several examples of proposed small open space areas. We suggest that these terms be defined so that this Department, and any other potentially involved agency, may anticipate its role (if any) in this phase of the Central City West program.

Response: Agreed; Plazas should be redefined as privatized plazas: open to the public, but maintained, owned and operated by the private property owner.

Comment 10.h: The map titled "Existing Recreation and Park Facilities" (Page 282) does not include Toberman Recreation Center, which is located immediately north of the Santa Monica Freeway and west of the Harbor Freeway, nor Lafayette Park, located immediately west of the study area north-west of MacArthur Park. Two other missing park properties, east of the Harbor Freeway and possibly of less importance to this project, are Pershing Square in the Downtown area and Alvarado Terrace, east of Hoover Street and south of Pico Boulevard.

Response: Agreed; Figure 57 (DEIR p. 282) highlights recreational resources in or adjacent to the CCW area.

Comment 10.i: If a Community Facilities District were to be developed (Page 288), funds could be set aside for specific park land acquisitions and development. In fact, a Community Facilities District is currently under consideration for funding major improvements at Pershing Square.

Response: Agreed.

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11. Commentor: Robert S. Horii, City Engineer
Bureau of Engineering

March 22, 1990

Comment 11.a: Streets and Highways Element of the Transportation Plan Functional Policies. Significant changes to the street uses and alignments within the Plan area are being proposed and we will need access to relevant engineering studies and data generated during plan preparation to adequately evaluate the feasibility and cost for these changes. For these street use and alignment changes, we request that your consultant provide or prepare preliminary engineering or route studies that include the following data for our review: 1. horizontal and vertical alignment showing maximum cuts, fills, and grades; 2. roadway widths and additional rights-of-way (R/W) requirements; 3. drainage requirements including mainlines and laterals with supporting hydraulics and hydrology based on planned land uses. Alternative sources of funding should be made available and included in the Specific Plan. We have similar concerns with the freeway improvements and the transit/TDM improvements. Information relating to projects

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proposed in Area II, which are required for plan implementation and requiring extensive modifications or new construction, should also be submitted.

Response: Agreed; see response to Comment 2.a.

Comment 11.b: Sewer Infrastructure. Neither the Plan nor the Ordinance address any sewer mitigation requirements due to the Specific Plan buildout. We believe that the present sewer system is flowing at maximum capacity and that further development without prior system improvements is unacceptable. We request data based upon proposed plan land use and an evaluation of the existing system capacities that will demonstrate that facilities are defined and funding sources identified to support interim stage development and Plan buildout.

Response: Mitigation measures recommended in the DEIR (page 311) will palliate wastewater impacts. In addition, the Community Facilities District will coordinate with the Bureau of Engineering to identify sewer line improvement needs. See response to Comment 5.a.

Comment 11.c: Stages of Implementation/Phases of Development. The correlation between implementation of the Specific Plan's Land Use Element and supporting infrastructure is addressed in both the Plan and Ordinance. We request data to determine if the various infrastructure improvements tied to the phased buildout is viable. The Ordinance prohibits issuances of various permits unless the supporting infrastructure improvements are completed. The Specific Plan allows for development to proceed to the next phase of buildout via the Conditional Use Permit (CUP) process. The Plan does not provide sufficient guidelines to make a determination and does not address what types of mitigation measures will be required to allow development to proceed without having the infrastructure improvements completed.

Response: See response to Comment 2.n.

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III. Response to Comments

STATE AND OTHER AGENCIES

12. Commentor: David C. Nunenkamp, Deputy Director, Permit Assistance
Office of Planning and Research February 13, 1990

Comment 12.a: The State Clearinghouse submitted the above named environmental document to selected state agencies for review. The review period is closed and none of the state agencies have comments. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Response: Comment acknowledged.

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13. Commentor: Jerry B. Baxter, District Director
Department of Transportation February 16, 1990

Comment 13.a: Caltrans has been working closely with the City Departments of Transportation and Planning, as well as with the traffic consultants who assisted in the preparation of the Plan. We have been advised by the City that due to the important regional transportation implications of the project, the City will hold a second public hearing to focus on transportation issues. We will present our comments on the EIR Plan at that meeting and we have been advised that our comments will be reviewed at that time.

With regard to the land entitlement issues for Caltrans-owned properties in the Central City West area, Caltrans is pleased with the progress made in our discussions with the City. We are reviewing the Plan and the relevant sections of the Draft Ordinance, and are working with City staff on these land entitlement issues. Because we see a strong linkage between the transportation issues and land entitlement issues, we will defer our comments on both until the time of the second hearing.

Response: Comment acknowledged.

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14. Commentor: John L. Lewis, Chief Technical Support Unit
Regional Water Quality Control Board LA Region

January 12, 1990

Comment 14.a: Based on the information provided, we recommend the following: We have no further comments at this time.

Response: Comment acknowledged.

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15. Commentor: Anne Baker, Director, Environmental Planning
Southern California Association of Governments

February 22, 1990

Comment 15.a: The project under review is regionally significant with significant impacts on the region's ability to meet the policies and goals contained in the four plans. For this reason, SCAG is providing the comments attached to this letter, and also as a method of ensuring consistency between the project under review and the adopted regional plans.

Response: Comment acknowledged.

Comment 15.b: GROWTH MANAGEMENT. We have reviewed the Specific Plan and its EIR, and would like to indicate our support for the plan and its effort to address the issue of job/housing balance. While the project's effort to link employment development with affordable housing is a significant step towards achieving the job/housing balance goals of the Growth Management Plan (GMP), we believe the level of housing growth should be greater, given the level of job development anticipated in the project. The project's EIR addresses the issue of job/housing balance for the immediate area in light of the GMP's job/housing balance policy. Compared to the existing Westlake community plan for the area, the specific plan allows for a greater mix of land uses. The Specific Plan reduces the area's job production by 40% and boosts the number of housing units that can be accommodated by 50%. These land use changes will, in the long run, improve the job/housing balance for the area and the subregion in which the project is located. In addition, the land uses presented in the Specific Plan are phased to coincide with the timeline of the GMP.

The linkage between job development and affordable housing is an effective and valuable tool for job/housing balance, and we recommend its use in all specific plans in the City. However, further steps are still necessary to ensure the construction of the additional units needed for better balance. We have calculated that in order for the

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Specific Plan to be consistent with the job/housing balance policy, an additional 2,200 units should be associated with the project, or a reduction in VMT equivalent to the effect of the job/housing balance policy. The needed units are determined by the difference between the desired housing production with the implementation of the job/housing balance policy and the anticipated housing production based on the GMP's Trend Projection. (See following section, Technical Notes 1, for more detail).

To reach the desired level of housing growth (additional 2,200 units), various approaches may be taken by the City. The additional housing units can be anywhere in the Central Los Angeles Subregion. The City could take steps to upzone residential densities in and around the project area or elsewhere in the subregion. Another approach could have the Specific Plan include market rate housing along with affordable housing when linked to the project's employment development with promotion of market incentives both in and around the project area.

Response: The Specific Plan has attempted to maximize the development of housing in the area. The total of 12,000 units provided for under the Specific Plan represents a projection of the maximum market demand for housing, given cumulative residential and non-residential development in CCW and the surrounding subregion, as presented in the discussion of the feasibility of an increased-residential alternative (DEIR pages 401-411). This level of demand would apply given the incentive program of subsidies contained in the Specific Plan housing element. However, the residential entitlements provided for under the Specific Plan could be developed to some 14,450 dwelling units, if fully utilized. Therefore, though the Specific Plan and DEIR are based on the projected market demand for 12,000 units, the Specific Plan's total entitlement envelope addresses SCAG job-housing balance and housing availability goals for the area.

Comment 15.c: Another option could be to accelerate the construction of housing units to add 2,200 units by the year 2010. Employment opportunities could also appropriately be phased to ensure that housing production is not lagging. If construction were to take place under the Specific Plan's proposed zoning, it is estimated that between 14,000 and 16,000 dwelling units could potentially be built. Since the estimate of the project's housing construction is based on the median zoning capacity for the area, the potential for growth above and beyond the Specific Plan's estimate of 7,687 units between 1988 and 2010 exists.

Response: See response to Comment 15.b.

Comment 15.d: One additional area of concern is that countywide growth patterns between 1984 and 1987 show that job opportunities have been growing faster than housing construction. This recent growth pattern indicates a housing shortfall, which, if

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sustained in the future, could aggravate the area's job/housing imbalance. In recent years the Central Los Angeles Subregion has captured a significant amount of the County's job growth, while there are indications that housing production has lagged behind. We estimate a housing shortfall of around 2,000 units between 1984 and 1987 in this subregion, a proportion of which can be associated with Central City West; we estimate an additional mitigation of approximately 440 housing units of this shortfall could be associated with Central City West. (See Technical Notes below.)

Response: Agreed; the DEIR confirms this existing housing availability shortfall through an analysis of local housing vacancy rates compared to the County averages (pp. 126-127). Multi-family unit vacancy rates in CCW are almost half of the Countywide rates (1.3% and 2.2%, respectively), suggesting a need for housing production. The additional 440 units have been added to the Specific Plan.

Comment 15.e: TECHNICAL NOTES. The Growth Management Plan's Trend Projections for the Central Los Angeles Subregion indicate an increase of 241,900 jobs and 101,200 dwelling units from 1984 to 2010. This is a ratio of 2.39 jobs per housing unit. Compared to trend projections the policy forecasts for the subregion, which incorporate the job/housing balance policy, increases the proportion of housing to jobs. From 1984 to 2010, the policy forecasts a ratio of 1.65 jobs per housing unit. This ratio is considered the job/housing balance performance goal for the Central Los Angeles subregion.

A certain amount of housing construction in the subregion should be associated with a regionally significant job-rich project in a job-rich subregion. The Central City West project under the Specific Plan would allow for an addition of 52,271 jobs by the year 2010. The number of housing units associated with this number of jobs using the Trend Projection ratio for the Central Los Angeles subregion is: $52,271/2.39 = 21,868$. Under the job/housing balance forecast ratio, the number of housing units would be: $52,271/1.65 = 31,751$. The appropriate number of dwelling units associated with the job/housing balance policy for the project is the difference between the adopted GMP Forecast, which includes the implementation of the job/housing balance policy, and the housing production under the Trend Projection. This is $31,751 - 21,868 = 9,883$ dwelling units. The Specific Plan estimates the addition of 7,687 units; thus, an additional 2,200 units should be associated with this number of jobs to reflect the regional/housing balance policy.

Response: The level of housing production set in the Specific Plan at 12,000 units total for the year 2010 reflects a market projection of demand within total entitlements for some 14,450 units. (See response to Comment 15.b.) Therefore, the Specific Plan should be considered as addressing the demand for housing - the job-housing balance issue of housing availability. With regard to the job-housing balance issue of

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reducing congestion and air quality impacts of commute travel, the Specific Plan seeks to supplement its job-housing balance program with the implementation of TDM and transit measures to achieve a reduction of VMT equivalents, as cited in Comment 15.b.

Comment 15.f: It appears that the actual ratio of jobs to housing that is occurring is worse than assumed under the Trend Projection. Countywide growth patterns between 1984 and 1987 shows that the job/housing ratio was 3.02 jobs per housing unit -- indicating a housing shortfall. (SCAG's Trend Projection ratio for Los Angeles County between 1984 and 2010 is 1.46.) For the Central Los Angeles Subregion, this housing shortfall is estimated at 2,000 units between 1984 and 1987. This shortfall calculation is based on the difference between the annual average of the housing Trend Projection (1984-2010) and the annual average of the recent housing growth (1984-1987). Housing Shortfall = (Ann Ave 84-2010 Trend) - (Ann Ave 84-87Est) * 3 yrs = (3,892 - 3,233) * 3 yrs = 1,977 units. A proportion of this housing shortfall could be associated with Central City West. Applying this proportion (estimated at 22% which is the project's share of the subregional trend job growth) yields an additional 440 housing units to be mitigated.

Response: See response to Comment 15.d.

Comment 15.g: AFFORDABLE HOUSING. The DEIR housing production target calls for 12,000 housing units in the Specific Plan Area by the year 2010. Approximately, 44% of the area's housing stock (5,300 units) will be priced within the means of households with modest incomes through affordability provisions incorporated in replacement, rehabilitation, inclusionary and linkage fee programs. Existing residents with lower incomes will be given first priority for housing produced through the program and relocation payments and assistance will also be provided. A program goal is to preserve as many existing units as possible through moderate rehabilitation (up to 1,333 units).

The affordable Housing Program is distinguished by the innovative use of new program approaches emanating, in part, from the City of Los Angeles' Blue Ribbon Task Force on Affordable Housing and the level of financial commitment made by the business community in partnership with the City. The DEIR emphasis on balancing job and housing growth while maintaining an economic range of housing opportunities is consistent with the Regional Housing Needs Assessment (RHNA) and Growth Management Plan (GMP). However, several program issues should be clarified.

In terms of affordable housing production targets for the commercially based components of the program, the Specific Plan Ordinance calls for the development of 2,000 units through the replacement and linkage fee programs. It is noted that any resources collected in excess of those needed to build or refurbish the 2,000 units will be refunded back to the private owners. This is inconsistent with the DEIR program

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description.

Response: Agreed; the Specific Plan Ordinance is being revised to reflect a minimum - rather than a maximum - of 2,000 replacement units and 5,300 total affordable units produced, as set forth in the DEIR (p. 135).

Comment 15.h: The DEIR states that a minimum of 2,000 units will be provided through the commercially based program components (1,000 units under each program), with any excess resources being used to build even more housing. There is no building cap. If more than 12,000 units are needed to offset job growth impacts through the year 2010, then the "excess" resources collected through the commercially based programs will be needed to build more affordable housing. Rather than the Specific Ordinance program cap at 2,000 units, the DEIR's more flexible approach should be used and the 2,000 unit goal treated as a minimum.

Response: Agreed; see response to Comments 15.e and 15.g.

Comment 15.i: The Specific Plan Ordinance and DEIR address affordable housing production goals, targets and programs. However, no mention is made of how units produced will remain affordable. Both documents should indicate what the low income use restrictions are and what qualifies a unit as credit eligible. For instance, is there a set period of time a dwelling is reserved for low income occupancy or will the restriction be in perpetuity? Will the affordability mechanism be implemented by a deed restriction or will some other approach be used? These issues should be addressed in both the Specific Plan Ordinance and the Final EIR.

Response: Agreed; the Draft Specific Plan Ordinance will be amended to state a 30-year term for subsidies through deed restrictions.

Comment 15.j: TRANSPORTATION IMPACTS. Scale of Project. Proposed project at buildout would include 25 million square feet of commercial space and 12,000 units of housing (including an existing 4,000 plus units). The net impact of this development will be a growth in employment from 26,500 to 78,771 (+197%), and a growth in population from a present figure of 13,093 to 31,096 (+138%). Although the plan seriously attempts to mitigate these impacts on the transportation system, it is not clear that the system can accommodate the additional volume of traffic on the roads and highways, especially when added to the additional traffic which is anticipated from projects in Downtown itself. The modelling of the traffic improvements must be verified at each stage of development as called for in the Draft Specific Plan Ordinance to assure that implementation is proceeding according to the plan. In addition, growth in downtown Los Angeles will significantly impact all facilities in the area, and requires parallel mitigations if this plan is to succeed. The proposed ordinance implementing the plan speaks to this concern with respect to the Central City West project only, leaving

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Central City West to resolve problems not all of which can be directly attributed to it. The relative scale of development anticipated between downtown (22 million sq. ft) and Central City West (an additional 18 million sf) suggests the need to develop a plan to create similar mitigation requirements in Downtown.

Response: Traffic impacts and mitigation requirements were modeled for each development phase, as presented in DEIR Table 35 (p. 190). See response to Comment 2.n.

Comment 15.k: Metrorail. Recently reported objections by SCRTD to a station at 7th and Bixel, and their concerns about the cost and availability of the kinds of equipment needed to operate buses in tunnels indicate that prior to any development under the terms of this project, clear agreements will have to be made to assure that all planned transit will be available. It should be pointed out that other US transit systems, while maintaining a 3/4 to 1 mile spacing between stations, do shorten the distance where traffic warrants. Stations in San Francisco on Market Street, downtown Boston, Chicago, Philadelphia and New York are often closer than 1 mile, and frequently at 1/2 mile separations. Paris Metro, one of the world's best systems, is required by law to place stations at 750 meter intervals (820 yards or less than 1/2 mile).

Response: Agreed; this information corroborates the Bechtel study of initial feasibility of the MetroRail station. See response to Comment 2.e.

Comment 15.l: Phasing of Street Improvements. As with the general discussion under Paragraph 1 above, each phase of development must be predicated on firm agreements with Caltrans and the City for street improvements and freeway access improvements. Under CMP, no project of this sort will be allowed to reduce the level of service below existing on major arterials and freeways, most of which are in the F category currently. Thus, any development will have to be preceded by the necessary improvements in traffic management to handle the additional traffic. This places a heavy burden on the developers to finance these improvements prior to completing construction of supporting properties. Further, it should be noted that the full mitigation proposed is based on a sharing of financial support between the Project and the Public Sector, which is expected to pay for approximately \$450 million of the \$800 million in total costs. The plan, however, does not speak to where these funds can be found, which is a significant problem given the shortfalls projected in all categories of transportation development in the coming 20 years (see The 1989 Regional Mobility Plan and "On the Road to the Year 2000").

Response: Agreed; adoption of the Specific Plan would call for the identification of regional funding sources needed to implement the cumulative share of transportation facility improvements. However, it should be noted that \$450 million of \$600 million total (not \$800 million stated in comment) will be private sector funds.

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Comment 15.m: Data Base for Projections. According to DKS (in personal communication), traffic projections were made based on the SCAG 82-Modified population projections, rather than on the more current GMA4-Mod/Job Housing Balance projection. A quick examination of selected links on the freeways and arterials in and near the project area shows significant differences in projected traffic, with freeway traffic anticipated at between 0.9% to 6.5% greater under GMA4-Mod/JHB, and arterial traffic showing directional increases of as much as 45% on certain links. The conclusion is that projections shown in the DEIR are lower than should be used, and that overall traffic would be greater than projected by DKS. The impact on the plan of all these increases is unknown, and requires evaluation to determine if additional mitigations will be required.

Response: As the GMP growth forecast was under development during preparation of the Specific Plan, it was not available for use as a data base for modeling of the transportation system. An analysis of the projected link volumes from the two SCAG model runs (SCAG82M versus GMA4MJH) at a cordon surrounding the cumulative effects study area utilized in the DEIR (pp. 58-59) reveals that PM-peak period arterial volumes across these 32 links totals 129,132 under the GMP growth forecast compared to 170,413 under the SCAG82M forecast; this indicates that surface street traffic volume projections may be 32% higher in the CCW model than that which would have resulted from using the more-up-to-date GMP forecast. Mitigation requirements developed under the Specific Plan therefore represent a conservative program, especially since the program requires most-effective mitigation (M3) and more-extensive facility improvements (see response to Comment 2.b). Nevertheless, under either the SCAG-82M or GMP growth scenarios, the CCW share of growth - especially on regional facilities such as freeways - would remain at substantially the same levels as those analyzed in the Transportation Specific Plan and DEIR. Therefore the CCW share of transportation impacts and mitigation would remain stable between the two forecasts.

Comment 15.n: Relationship to RMP, AQMP. Overall, SCAG is concerned with the criticality of the phasing of the project and its relationship to the goals of the Mobility and Growth Management Plans as applied to this core area of the SCAG Region. Currently, improvements to the transit system follow with considerable lag development of both housing and commercial sites. Unless transit development can be made to coincide with or even precede expansion of demand in this area, the additional traffic burden may prove impossible to manage. Thus, the phasing and monitoring processes called for in the plan and the implementing ordinance must be adhered to if they are to be effective.

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Response: Agreed; the phasing and monitoring requirements of the Specific Plan Ordinance will prescribe whether the CCW area is meeting its mitigation obligations and therefore whether development will be allowed to proceed to the next phase.

Comment 15.o: HOV LANES. HOV Lanes on Glendale Blvd., either surface or elevated structure, makes good sense. An HOV Lane is called for on the Rt. 2 Freeway, and an unconstrained HOV Lane is called for on Rt. 101. Connecting these facilities with the I-110 Transitway would be beneficial in meeting transit and rideshare goals.

Response: Agreed; the CCW Specific Plan was designed to facilitate this suggested connection by extending the I-110 transitway through CCW along the Bixel-Glendale Boulevard Corridor, providing for the eventual connection to a Route 101 HOV lane and the potential extension of a Glendale Boulevard Transitway to the end of the Route 2 Freeway.

Comment 15.p: No funding is provided by CCW project for the proposed Rt. 101 HOV lane. Conditioning CCW project phasing on the presumption of completion of the Rt. 101 HOV Lane to achieve carpool goals is unrealistic.

Response: The CCW project phasing is not conditioned on the presumption of completion of the US-101 HOV lane. The US-101 HOV lane was not assumed to be in existence in the traffic forecast model runs for the 25 million square foot CCW Specific Plan scenario. The forecasts for the 35 MSF build-out scenario did include the US-101 HOV lane in the analysis. However, the Specific Plan ridesharing/transit goals are not conditioned on Specific facilities. Rather, the developers are required to monitor their projects trip generation and not exceed the single occupant vehicle goals included in the plan. If they meet the SOV goals by encouraging employees to rideshare, take transit, bike or walk to work, it does not matter, so long as they do not exceed the SOV goals.

Comment 15.q: A reversible HOV lane on Glendale Blvd. north of Rt. 101 would not adequately handle bus traffic. This part of the CCW Specific Plan is inadequate. Bus routes might have to be rerouted from the San Fernando Valley, Sunset Blvd., or the Glendale area directly into CCW. This would make sense, if a Metro-rail connection is available, and if it could produce significant operating savings to the bus operator. Only a two way arterial HOV makes sense for transit operations in an urban core area.

Response: The volume of CCW-related buses in the peak hour on Glendale Boulevard was estimated to be each a maximum of approximately 55-60 in the peak direction (inbound in AM, outbound in PM), assuming 25 percent of the CCW-bound buses use the Glendale

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Corridor. The capacity of an HOV lane, reversible or permanent, is approximately 750 vehicles per hour, assuming 50 percent green time at traffic signals. A bus is equivalent to approximately two cars. Therefore, the 55-60 buses will utilize the capacity of the equivalence of 110-120 cars, leaving additional capacity in the HOV lane for 630-640 carpools/vanpools in the peak hour. A single reversible HOV lane should be adequate to accommodate these demands. A two-way HOV would also accommodate these demands and may be preferable to the community. SCAG has recently undertaken a study of the appropriate locations and design of HOV lanes in the LACBD. The outcome of that study will provide the City of Los Angeles with valuable data as input to the Glendale Boulevard Corridor design as it evolves in future months and years.

Comment 15.r: An HOV Bus transit tunnel may not be operationally feasible. A bus tunnel would be very difficult to adequately ventilate with conventional diesel buses. It would also be extremely noisy and create an environment which would not be conducive to passengers. Harvard Square in Boston does operate such a single end station with diesel buses; it was originally electrified. Seattle and Toronto both operate underground bus stations with electric buses.

Response: Although it is the opinion of the Specific Plan authors that it would be feasible to design and operate a bus transit tunnel with ventilation and open air stations and/or median islands above the tunnel, the Specific Plan is now proposed to include an at-grade transitway along Bixel Street. Therefore, the issue of bus tunnel ventilation is no longer an issue of concern.

Comment 15.s: Alvarado and Glendale Blvd. intersection is omitted from any listed improvements. This intersection which will be vital to relieving CCW traffic and taking it to the Rt. 2 Freeway is already at severely congested during peaks, with delays of five to ten minutes not unusual. Relieve of congestion caused by CCW at this intersection is essential, if assumptions of Rt. 2 handling CCW traffic are to be realized.

Response: The Glendale Boulevard/Alvarado Street intersection is not proposed to be improved as part of the Specific Plan because the Specific Plan is designed to downplay Glendale Boulevard as a major access route to CCW for single occupant vehicles, at the request of representatives of community groups along the Glendale Corridor. The Specific Plan palliates the needs for improvements at Glendale/Alvarado by proposing to improve the freeway-to-freeway connection between the Golden State Freeway (I-5) and the Pasadena Freeway (Route 110), Alameda Bypass and the Glendale Transitway to raise auto occupancy and to encourage CBD and CCW traffic to remain on the freeway system rather than

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travelling along Glendale Boulevard and passing through the Alvarado Street intersection.

Comment 15.t: PARKING REQUIREMENTS. Parking requirements for Carpools and Vanpools arriving at CCW are inadequate. Assumptions that 25% of carpoolers will be 2 person, 50% of carpoolers will be 3 person, and 25% will arrive in 8+ vanpools are unrealistic, based upon empirical observation of model TDM programs. Thus, the assumption that only 10% of parking will be required for carpools is exceedingly optimistic. Carpool occupancy rates of 4 persons per vehicle, on which carpool parking requirements are based, are not supported by any known data.

Response: The parking requirements included in the Specific Plan are stated as the maximum allowable number of parking spaces per square foot of floor area, by stage of development. There is also a requirement that a minimum of 10 percent of the parking spaces be designated for high occupancy vehicles; carpools or vanpools. There is nothing in the plan to preclude individual developments from designating a greater percentage of their total allowable spaces for HOV's.

Comment 15.u: No Parking Pricing Policy is mentioned in the CCW Specific Plan, Parking Element. Parking pricing strategies are an effective motivation to carpool and use transit. Will parking be free? Monthly paid? Pay on exit? Discounted to carpools? This would be helpful in explaining how it is anticipated that the reduced parking requirements will be converted into the figures on Table 3.2.

Response: Though parking limitations are included as an element of the Transportation Specific Plan and the Specific Plan Ordinance towards implementation of TDM objectives, parking pricing requirements are beyond the scope of the Specific Plan or EIR.

Comment 15.v: AIR QUALITY. The air quality impact assessment in the Draft EIR appears incomplete and lacks the details usually expected in an analysis of a project of this magnitude. In some instances, proper tools of analysis have not been used. The analysis concentrates on CO, while the analysis of other pollutants, especially, ozone precursors and particulates is severely lacking.

Response: On the contrary, the air quality impact analysis conforms to the SCAQMD specifications for such projects.⁴ The analysis addresses the entire range of criteria pollutants, including citing existing conditions for ozone, total particulates, inhalable particulates, carbon monoxide (one-hour and eight-hour), nitrogen dioxide, sulfate, sulfur dioxide and lead in Table

⁴ SCAQMD. *Air Quality Handbook for Preparing Environmental Impact Reports.* Revised April 1987.

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44 (DEIR page 231); through forecasting project impact construction and occupancy and operation emissions scenarios for ozone precursors (TOG, ROG, NO_x), CO, SO_x, TSP and PM₁₀ in Tables 46-47 (pp. 239-240) using the California Air Resources Board EMFAC7PC model; and through forecasting project traffic carbon monoxide dispersion impact scenarios in Table 45 (p. 235).

Comment 15.w: The emission factors used in Caline-4 dispersion model study are inappropriate and out of date. EMFAC 7C emission factors have been superseded by EMFAC 7D emission factors.

Response: The emission rates utilized for Caline4 are those produced by the EMFAC7PC model, as specified by SCAQMD. EMFAC7 version D is only used by SCAG for its DTIM runs on a regional basis, and are not specified for application in the Caline4 analysis.

Comment 15.x: The analysis emphasizes one-hour concentrations. The 8-hour average concentrations are scantily analyzed. Only 1-hour values appear to be modeled. The 8-hour values are derived by applying a factor to the 1-hour average. This factor is assumed to remain constant with the conditions in the future. The explanations of results and mitigations are very inadequate. Cumulative impacts are not analyzed in depth. No air quality modeling appears to have been performed beyond Caline-4 analysis of CO. This analysis also makes questionable assumptions on meteorological variables.

Response: On the contrary, Tables 44 and 45 (DEIR, pp. 231 and 235) present monitored and modeled levels of CO for comparison to both the 1-hour and 8-hour standards. Cumulative impacts are analyzed in depth, through comparison of the "1989 Existing", "2010 Cumulative Without Project", and "2010 Cumulative With Project" columns of Table 45 (p. 235).

Comment 15.y: Hauling of dirt to landfills seems to be the only significant activity arising from the development that has been analyzed for specific air emissions. The activity related to earth moving equipment seems not to be addressed. This activity is expected to contribute significantly to the level of pollutants. However, there seems to be no assessment of fugitive dust emissions associated with this activity.

Response: On the contrary, the DEIR (p. 238) cites both the grading and hauling impacts of construction. In addition, these impacts will be analyzed in detail when specific projects are proposed within the Specific Plan development program.

Comment 15.z: The results of the analysis appears to be discussed inadequately. The

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exceedance of 8-hour CO standard is explained as being due to background concentration levels. The project's impact on air quality, adds to the worsening of the area's existing bad air quality levels. However, the project's impacts are considered insignificant. This should be changed to "significant," and hence, needs to be mitigated.

Response: On the contrary, project TDM and facilities improvements reduce congestion, resulting in reduced 1-hour and 8-hour CO emissions compared to either existing or cumulative-without-project (regional year-2010 growth with no growth in the CCW area over 1989 densities) conditions. Therefore project impacts are considered non-significant beneficial.

Comment 15.aa: There is no analysis of the effect of Transportation Demand Management program included in the traffic impacts. Specifics of the TDM program are not stated clearly. Mitigation measures, as proposed, are not in the shape of specific programs. They appear to be a list of recommendations, more like a wish list. The following mitigations, for example, lack any specificity: "encourage HOV modes," "reduction of allowable parking," development of rail transit," "improved jobs/housing balance," "shifting of a.m. peak-hour trips at CCW establishments." There needs to be an analysis of the level of parking to be reduced, the type of rail transit envisioned, and how the a.m. peak-hour trips are going to be shifted. The package of mitigation measures needs to be oriented specifically towards the actual air quality problems associated with the project.

Response: The Transportation section of the DEIR (p. 179-182, 226) details the roadway, transit and TDM programs specified as part of the Transportation Specific Plan. Each owner will be specifically responsible for meeting their TDM requirements and will be subject to TDM penalties for non-compliance (see response to Comment 2.i.) The plan further calls for formation of a TMA to further assist in meeting ridesharing goals.

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16. Commentor: Gary S. Spivack, Director of Planning
SCRTD

February 22, 1990

Comment 16.a: The SCRTD would like to offer the following correction to Section S.3. Access and Alternative Modes. The route for the remaining 12.91 miles of Metro Rail was finalized by the certification of the Final Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report on September 4, 1989. The preliminary work for the Phase 2 alignment has begun. There are no plans within the MOS-1 alignment or the Phase 2 program for the construction of a Metro Rail Station within the confines of the CCW Plan area. There are no UMTA or Proposition A funds

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currently allocated for the financing of the proposed CCW Metro Rail Station. Funding for Phase 2 is expected to be received from UMTA, derived from benefit assessments, from Proposition A funds, and from local matching funds.

Response: The correction regarding the certification date for the Final SEIS/SEIR on September 4, 1989 is noted. The CCW plan acknowledges that there are no plans within the MOS-1 or Phase 2 program for the construction of a MetroRail station in the CCW area. The plan proposes to add a station in the CCW area to the MetroRail project. The current estimate of the CCW developers' contribution toward the construction of this station is \$70.1 million, equivalent to an up-front fee of \$2.80/square foot of commercial office spaces to be paid at the issuance of a certificate of occupancy through the proposed traffic impact fee.

Comment 16.b: We have some concerns with the discussion of cumulative impact of the traffic and transportation improvements suggested for the area. The cumulative impacts should address the possibility of the Community Facility District not gaining voter approval and those funds therefore unavailable to support the improvements. The resulting impact on regional transit improvements may be a lapse in the implementation of regional improvements. Although the allowable development is restricted by the implementation of transportation improvements, there should be a discussion of the cumulative impact of the Plan if portions of the mitigating improvements are not achievable.

Response: Although it is always a possibility that the Community Facilities District might not gain voter approval, it is considered a remote possibility given the anticipated nature of the CCW Community Facilities District. Residential properties will not be included in the District and only the major commercial properties which primarily represent the memberships of Center City West Associates will be included. Should the Community Facilities District not be implemented alternative sources of funding for the infrastructure improvements or alternative mitigating improvements would have to be found in order for development to proceed from stage to stage. The Specific Plan proposes that a monitoring system be implemented to track the trip generation of projects and compare their performance against their TDM goals, as well as monitor levels of service across screen lines in the CCW area. The cumulative impact of the plan would not be significantly different if portions of the mitigating improvements were not achieved because the phasing mechanism in the plan requires that either alternative improvements, providing comparable levels of mitigation, be provided or development will not proceed to the subsequent stages.

Comment 16.c: The analysis of parking impacts should include a discussion of the

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impact of the proposed parking requirements on the success of the transit improvements. The Plan states that if Single Occupant Vehicles (SOV) goals are achieved without the implementation of any of the improvements that development may proceed. An additional mitigation to insure the SOV usage will decrease whether or not the transportation improvements are implemented upon schedule would be the reduction of parking to the Stage 2 levels (1.8 per 1000 sq. ft.). We would appreciate these concerns being addressed even within the level of questions, please contact Dana Woodbury at 972-4841.

Response: The parking requirements are designed to support and complement the transit improvements. The maximum allowable parking ratios decline overtime reflecting the plans TDM goals. Employees will be encouraged through the mechanism of a shrinking parking supply (on a space per square foot basis) to shift to transit or ridesharing. It is correct to note that the plan states that if the SOV goals are achieved, development may proceed. The purpose of stating the TDM goals this way was to provide flexibility; to CCW developers and employers, the City and regional agencies. So long as the number of cars driving to/from the CCW area is controlled and the traffic impacts managed, it does not matter if the reduction in trip generation is due to employees riding MetroRail, light rail, commuter trains, shuttle buses, commuter buses, vanpools, bicycles or even walking to work. The goal of the plan is to reduce dependence on the automobile.

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17. Commentor: Don Dockray, Codes and Ordinances Administrator
Southern California Gas Company

February 7, 1990

Comment 17.a: Within areas of interest and responsibility of Southern California Gas Company (SoCalGas), we find the proposed development reasonable and acceptable. This letter is not to be interpreted as a contractual commitment to serve the proposed project, but only as an information service. Its intent is to notify you that the project can be served from existing mains in the area. This can be done without any major impact on overall system capacity, service to existing customer, or the environment.

Response: Comment acknowledged.

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III. Response to Comments

CCW PROPERTY OWNERS, TENANTS AND REPRESENTATIVES

18. Commentor: David Grannis, Association Manager
Center City West Associates February 8, 1990
[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]
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19. Commentor: David Grannis, Association Manager
Center City West Associates February 16, 1990
[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]
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20. Commentor: Michael Bodaken, Senior Attorney
Legal Aid Foundation of Los Angeles February 8, 1990
[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]
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21. Commentor: Michael Bodaken, Senior Attorney
Legal Aid Foundation of Los Angeles February 22, 1990

Comment 21.a: You are undoubtedly aware that on December 1, 1988, this office provided the Department of Planning with extensive comments on the Notice of Preparation for the EIR (hereafter "DEIR") for the Central City West Specific Plan project. As I explained more fully in that letter, which is incorporated by this reference, the impact of commercial development in this area will necessarily lead to a loss of development in this area will necessarily lead to a loss of affordable housing: 1) through the creation of more jobs for higher income workers who will add pressure to

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the existing housing market; 2) due to the gentrification of the area which will lead to loss of affordable housing via vacancy decontrol of the Los Angeles Rent Stabilization Ordinance; and 3) through workers employed by commercial developments able to pay higher rents than the present populace.

Response: Agreed; the Housing and Jobs section of the DEIR (pp. 121-149) attempted to address the housing impacts of the Specific Plan.

Comment 21.b: Lack of Basic Information Concerning the Community The DEIR correctly observes that Central City West "forms a transition zone between the intense Los Angeles Central Business District uses to the east and the strip commercial/residential patterns to the west." But the DEIR (1) omits significant information about that community, information which was fully available prior to the drafting of the report; (2) fails to recognize that there is an existing community which will be disrupted by the construction of this large scale developments in conjunction with cumulative related projects; and (3) fails to analyze the impact of this proposal on the community.

Information about the community in which the commercial project is proposed is readily available. The demographics and social needs of Study Area One in Central City West have been the subject of extensive analysis and documentation since the spring of 1988. The City Planning Department is well aware of this since the Planning Department representative sat on the Central City West Steering Committee which contracted out for extensive analysis of the community and its needs. These analyses provide detailed information about the community which the DEIR omits.

Residents who live in the Central City West area are poor. According to documents prepared for the City, the estimated income of over 55% of the residents is less than \$10,000/yearly. Indeed, the median income in 1980 was less than \$10,000, less than 50% of the median for Los Angeles County. 90% of the housing units in the area are renter-occupied. Rents in the community tend to be low. Finally, over 2000 residential rental units have been lost in the area since 1980. Most of the residents are of Hispanic origin who work in unskilled and low wage jobs. Many women in the workforce have children at home. Most people take the bus to work and many of them work in the nearby Central Business District. But at no point does the DEIR fully discuss the potential impacts of these dramatic changes on the community. These changes must be included for the DEIR to act as the "full disclosure document" it was intended to be.

Response: On the contrary, the DEIR provided the cited information:

- Table 18 of the DEIR (p. 132) cited the fact that 55% of CCW households fall in the low under-\$10,000 household income category and indicates that this is not forecast to improve by the year 2010.
- Table 15 (p. 124) cites the fact that in 1988, some 96% of housing units

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were absentee-owned;

- the DEIR cites several statistics regarding housing demolition - loss of 16% of the area's housing units in the period 1980-1984 and 11% since 1984 (p. 85; and Figure 12, p. 86).

Comment 21.c: The DEIR Does Not Adequately Describe the Potential Impact of the Proposed Specific Plan on Affordable Housing The DEIR concedes that "[t]he cumulative effect of the addition of the related projects identified in Section IIIB would be to create additional demand for housing in the Central City area through growth in non-residential development." What they fail to point out is why this is so. In the words of authors of a recent Draft Environmental Impact Report for the Coopers & Lybrand Project: "[N]ew employees may also displace residents in housing closer to the CBD and/or to contribute to a more intense use of near CBD housing by increasing the number of persons per unit, subdividing units, or converting nonresidential buildings to residential properties and, if not balanced by income growth, contribute to an affordability problem." Clearly, the development of approximately 25 million square feet of commercial office space will "contribute to an affordability problem." This problem will disproportionately impact the majority of the present residents in the community, many of whom are very poor.

While it may be the case that the mitigation measures proposed will result in a net benefit to these residents, it is not enough for the Environmental Impact Report to gloss over a complete description of the impact itself. EIRs are to serve as environmental "alarm bells" to alert the public and governmental officials to impending environmental impacts before irreparable harm has occurred. The EIR is an "informational document" the public purpose of which "is to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project."

Response: Agreed; and the Draft EIR more-than-satisfied those expectations. The proposed Specific Plan decreased zoning entitlements and land use designations for non-residential parcels within CCW, and increased zoning entitlements and land use designations for residential parcels. The Housing Element of the Specific Plan is not an EIR mitigation measure, but rather an integral part of the proposed program; as such, the Housing and Jobs section of the DEIR states that the environmental impact of the Specific Plan would be to "ensure that housing removed for projects in CCW would be replaced before non-residential space is occupied." (DEIR, p. 128) The DEIR recommends additional safeguards in the mitigation section, specifying that the Specific Plan Ordinance require that housing units be available for occupancy before commercial space is certified for occupancy.

Comment 21.d: Except for approximately 1000 of the 5000 Affordable Units, there is No Phasing Mechanism Guaranteeing Affordable Housing Production as the Plan Proceeds. The Affordable Housing Requirements of the Draft Ordinance referred to in the DEIR seek to legally require the provision of the 5,300 affordable housing units set forth in the November 2, 1989 Draft Specific Plan. The Specific Plan provides a variety of mechanisms to achieve the affordable housing goals. These mechanisms include: a replacement housing component which requires certain larger commercial projects to document and replace, on a one for one basis in the form of new construction, housing units removed since 1984 for very low income households (60% of all units replaced) and for low income households (40% of all units replaced). Such units are to receive their certificates of occupancy simultaneous with the temporary certificates of occupancy of the commercial structures. Thus, these 1000 units are tied in time to the massive commercial construction contemplated in Central City West.

However, the draft ordinance does not tie any of the other programs to the construction for commercial structures. Thus, there is no phasing mechanism to assure that a certain number of low and very low income housing units must be constructed before building permits for massive commercial developments may be provided by the City to developers in Central City West. As a result, it is certainly possible that the best laid housing plans for Central City West will come to nought.

The transportation phasing section of the Ordinance provides a useful analogy. In the present ordinance, only a certain amount of development may proceed, absent a conditional use permit, if certain freeway system improvements have not been completed. Similarly, the draft ordinance must provide that only a certain amount of commercial development may proceed if certain amounts of affordable housing units have not been constructed in the Specific Plan and Secondary Housing Replacement areas.

The commercial development has been tied to 2,000 of the 5,300 replacement units. At the very least, there must be a demonstration that for each of the 4 phases of development, there is a corresponding showing that 1/4 of the affordable units promises have received certificates of occupancy. Otherwise, the Bunker Hillization of Central city West could well become a reality. In environmental terms, the impact of the project will not have been properly mitigated.

Response: On the contrary; see response to Comment 21.c.

Comment 21.e: Annual Ordinance/Plan Review The Specific Plan and its accompanying ordinance mark a break in City planning history. For the first time in my experience, community residents, advocates and developers have reached consensus on a variety of complex issues. But the community is not a static thing. The dynamics of the plan need to be reviewed by all parties so that full participation in the process of

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future development is assured.

Response: Agreed; monitoring and evaluation procedures are under development for implementation by the City Administrative Unit, Community Facilities District, and Housing Development Corporation.

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22. Commentor: Daniel J. Niemann, Managing Director
S-P Company

February 8, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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23. Commentor: Concerned Property Owners of Temple Beaudry no date

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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24. Commentor: Betty Davidson, Winifred Waddell January 20, 1990

Comment 24.a: We have reviewed the Central City West Specific Plan and are concerned that a payment will be imposed upon existing rental property within the Wilshire Corridor District. Our property is located at 1515 to 1519 West Seventh Street, in the block just East of Union Street, and consists of a store building with four rentals units. We are strongly opposed to the imposition of any fees or taxes on the commercial rental as long as the building exists as a free standing structure at this location.

Response: Developer fees proposed under the Specific Plan would not apply to the continuing occupation of existing uses; however, formation of a Community Facilities District by area landowners may result in assessments on area properties (at the time of change of use) to support development of needed facilities.

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25. Commentor: Bruce W. Manley
Manley Oil Company

February 1, 1990

Comment 25.a: Manley Oil Company would like to call your attention to several errors in the Draft EIR. There is an existing underground tank on the property at 152 Toluca Street, Los Angeles 90026. This site is not owned by Manley Oil Company. The report should read: The area was known as an area of oil seeps. No seeps of any kind have been discovered since the producing oil wells operate to prevent seeps and act as relief from reoccurring seepage and zone pressure. Since 1987, two oil wells have been abandoned: 1131 Temple Street, Los Angeles 90025, and 946 Adobe Street Los Angeles 90012. One of these wells is within the boundary of the DEIR. There are currently 28 wells within that boundary owned and operated by several different people.

Response: Comment acknowledged.

Comment 25.b: The Manley Oil company recommends that the Specific Plan for Central City West include consideration for continuing production of oil and gas in the Los Angeles City Oil Field and the necessary availability of street access to the storage tanks to allow for collection of the oil by tank truck. This includes the consideration of street and alley vacation as part of the transportation element of the specific plan. We will have additional comments to make at the public hearings.

With regards to Hazardous Waste: Currently the oil field generated waste meets EPA guidelines for Non Hazardous Waste Status. Documents are available on request.

A letter dated November 30, 1988 from the Department of Conservation, State of California Division of Oil and Gas, which is in your file and is attached to the DEIR, expresses our concerns and we feel that the matter of gas seeps and the migration of methane gas if the oil wells are abandoned, should be addressed as a matter of public health and safety. We are opposed to any unmitigated impact that will prevent the ongoing production of oil in the Los Angeles City Oil Field.

Response: The DEIR states that proper abandonment and/or reabandonment of wells and installation of gas venting systems will be necessary for development in the Temple-Beaudry Hill District (pp. 331-332). Recognizing the current desire of oil producers in the CCW area to continue production, the DEIR cites provisions of the Building Code and Municipal Code which regulate construction in the vicinity of oil wells and which state requirements relative to the problem of biogenic gas migration. These regulations will apply to developments proposed for the Temple-Beaudry Hill District.

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26. Commentor: Bonnie H. Riedel, Attorney at Law

February 14, 1990

Comment 26.a: The properties owned and or operated by Mr. Bruce Manley are listed by number on the enclosed map. Oil wells on the properties are identified by red dots. You are aware, I am sure, that the O designation on the properties, shown on the zoning map for the area, indicates that an existing zone variance has been approved permitting oil production for as long as twenty years from the time of the grant. Such authorization should be addressed in the EIR.

It should be noted that new oil wells and exploration are not contemplated at the present time. Some of the producing wells have been operating for approximately fifty years and an environmental statement should be in the EIR concerning the past and future on going activity of oil production.

When development is undertaken on the parcels of land identified on the enclosed map, as well where at present no visible oil production occurs, abandonment of the oil wells must be undertaken before a building permit is issued. The required abandonment procedure must be done in compliance with rules of the California State Division of Oil and Gas.

Response: The DEIR cites the existing "O" zoning designation in the area, noting that the oil drilling district is overlayed on predominantly R-3 and C-1 properties as well as some M-1 and MR-1 parcels. The DEIR also details the historical context of oil production in the area (pp. 317-321). See response to Comment 25.b.

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27. Commentor: Milton Sidley, Attorney at Law

February 6, 1990

Comment 27.a: I have to take exception to your preliminary plan designation as it pertains to a parcel I own on the corner of 8th Place and Golden Ave. The parcel on the corner of 8th Place and Golden fronts on the Harbor Fwy. and adjacent offramp. This unique location is one of the few remaining undeveloped parcels fronting the freeway. This parcel was acquired some years ago when the zoning density designation was 6 to 1 land to building. The new plan proposes to lower that density to 4.5 to 1. This new density will preclude development of what had been contemplated for the parcel, and will make it disadvantageous to the larger parcels to the north which have the 6 to 1 designation. To restrict this unique parcel to low density will insure development of just another tasteless structure fronting the freeway. Land with the visibility of this should

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reflect the image of Los Angeles as a major metropolitan area, and should not be limited in its scope.

Response: The City, through the Specific Plan process, has identified the maximum allowable densities on parcels areawide which would provide for adequate circulation and access, housing supply, urban design, land use compatibility and infrastructure and service capacity. Many parcels have been rezoned from FAR 6:1 to an FAR 4.5:1 limitation. The plan, with certain exceptions to account for potential shadow impacts, allows for structure heights of some 1,000 feet in the area of the commentor's parcel, which provides an ample envelope within which to create a structure which contributes to the image of Los Angeles as a world city. The decking of the Harbor Freeway with a park and pedestrian way as proposed under the Specific Plan will further enhance the opportunities for visual refreshment from and to the commentor's property.

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28. Commentor: Thomas G. Gertmenian
G.A. Gertmenian & Sons

February 9, 1990

Comment 28.a: We strongly object to that portion of the Central City West Specific Plan which provides for the 2nd Street southbound 110 Freeway off-ramp to be re-routed. If this were done, the ramp would: (1) Go through our existing building which is less than 5 years old; (2) Prevent further development of our property, which we consider to be very important frontage on 2nd Street and key to development of the adjacent properties to our east, west and south, notably the abandoned construction of Beaudry III. We hereby request that this letter become part [of the] hearing scheduled for Feb. 8.

Response: The ramp is not proposed through an existing structure; it would be elevated above the existing one-story structure due to the change in grade at that point. The right-of-way would most probably be developed through creation of an easement similar to a powerline easement along the back edge of the property.

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29. Commentor: Ken Spiker, President
Ken Spiker and Associates, Inc.

February 16, 1990

Comment 29.a: P.C. Crown Hill, Inc. applauds the City's efforts in preparing a Specific Plan to guide development in the Central City West area and for allowing the property

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owners to participate in the process. In general terms, the Plan is acceptable to P.C. Crown Hill, Inc. with several exceptions, the most noteworthy being the following:

First, P.C. Crown Hill, Inc. believes that a portion of its property bounded generally by Huntley Drive, Miramar Street and Bixel Street should be assigned a floor area ration of 6.0:1 instead of 4.5:1. This would be in keeping with the allowable FAR's on properties to the east and south.

Second, P.C. Crown Hill, Inc. believes that a portion of its property bounded generally by Emerald Street, Second Street, an extension of Huntley Drive, Huntley Drive and Bixel Street should be assigned a commercial floor area ration of 4.5:1 instead of 3.0:1.

Response: See response to Comment 27.a.

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30. **Commentor:** Paul Kells, Vice President, Facilities
The Hospital of the Good Samaritan

February 26, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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31. **Commentor:** Kenneth Churchill, Real Estate Department
United Parcel Service

February 15, 1990

Comment 31.a: UPS has strong objections to the development density allowed on the property according to the Specific Plan. The UPS property should have zoning density consistent with the Harbor Freeway corridor and Central Business District area surrounding the Convention Center. This would indicate a Floor Area Ratio of 6:1. The current draft of the Specific Plan seems to spot zone the UPS site to a lower density without reason. UPS recognizes the need to transition from the CCWA area into the residential area of Pico Union. Good project design, Olympic Boulevard as a major highway, the transitional height limit zones and the commercial property on the south side of Olympic Boulevard should all serve as elements which can form an effective transition from an urban planning point of view.

UPS would specifically request that the C2-4.5 zones be modified to C2-6, the CM2-3 to CM2-6 the CM3.0 to CM4.5 and C2-3 to C2-4.5. This would provide some transition from the adjoining 6 to 1 FAR area while being equitable and fair within the context of the area and the plan.

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Response: See response to Comment 27.a.

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32. **Commentor:** Gail Gordon, Attorney at Law
Lillick & McHose

February 15, 1990

Comment 32.a: This firm represents Chip Lian, a property owner within the Central City West Specific Plan Area ("Central City West"). This letter outlines our concerns, on behalf of Chip Lian, relating to the (1) draft Environmental Impact Report for the proposed Central City West Specific Plan, dated December, 1989 ("DEIR") and (2) revised preliminary Central City West Specific Plan, dated November 2, 1989 ("Specific Plan").

Background Chip Lian, through wholly-owned subsidiaries, owns certain property ("Property") in Central City West. In 1984, Chip Lian demolished rental units upon the Property pursuant to a City order to either bring the units into compliance with City earthquake regulations or demolish the units. The unreinforced masonry units were constructed prior to 1933. After good faith efforts to obtain financing for retrofit of the buildings, it became clear to Chip Lian that financing was unavailable. Thus, Chip Lian had no alternative but to demolish the units in compliance with all applicable City regulations, and did so. The Property has been used as a parking lot since the demolition, at a loss to Chip Lian. Despite the fact that the units were not demolished for commercial or residential development, the current drafts of the Specific Plan and the DEIR impose an obligation upon Chip Lian to replace the demolished units.

Response: Correct; demolition of housing units contributes to a deficit of available and affordable housing the project area, therefore, the Specific Plan obligates demolishers of housing to provide replacement units.

Comment 32.b: Replacement Housing Provisions in the Specific Plan and the DEIR The specific Plan and the DEIR contain provisions which, either directly or by implication, impose extensive obligations upon owners and developers of property in Central City West to provide replacement housing. Section IV.C. of the DEIR (pages 128-137) addresses affordable housing and replacement housing within Central City West. Most of the replacement housing provisions of the Specific Plan are located under the heading "Housing Element", commencing on page 32.

In imposing an obligation upon property owners and developers to replace housing units, the Specific Plan and DEIR do not consistently distinguish between units demolished for development and units demolished for other reasons, nor do they consistently limit the obligation to provide replacement housing to developers and property owners who were on notice of this obligation at the time of demolition.

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Chip Lian now has the opportunity to develop the Property with a hotel and office space. However, this opportunity and virtually any economically-viable development of the Property will be eliminated if Chip Lian is required to replace the units demolished six years ago, as required by the Specific Plan.

As in the Specific Plan, some provisions of the DEIR seem to distinguish between demolition in furtherance of development and demolition for other reasons. Examples of this language are found in the following sections: (a) Under the heading "Environmental Impact" in Section IV.C.1. (page 128), the DEIR states "[t]he proposed Specific Plan would ensure that housing removed for projects in Central City West would be replaced before non-residential space is occupied" (emphasis added). (b) The last paragraph of page 133 of the DEIR refers to priority for individuals displaced by commercial or residential development. (c) The first paragraph of page 134 of the DEIR states that relocation expenses shall be paid to individuals or households displaced by commercial or residential development.

However, certain provisions of the DEIR describe demolished or removed units without the limitations as outlined above. In Section C.2. of this letter, we have set forth several recommendations regarding specific revisions of the DEIR which, in tandem with the suggested revisions of the Specific Plan, create a distinction between demolition for development with notice of replacement housing obligations and demolition without notice of replacement housing obligations or demolition for reasons other than development.

Our recommended revisions to the DEIR and the Specific Plan preserve the concept that developers on notice of the replacement housing obligations must replace low income residential units demolished to make way for the development. However, we believe that it is unfair and improper to impose such an obligation upon property owners such as Chip Lian who did not demolish units for development and/or upon property owners who demolished units before they could reasonably have been aware of an obligation to replace the demolished units.

Response: Whether the housing units were demolished for new development or not, the demolition contributes to a worsening housing deficit. Furthermore, since the property is intended for hotel and office space development, as stated by the commentor, the demolition of housing and requirement for replacement units would have been necessary sooner or later.

Comment 32.c: Our suggested revisions to the DEIR are as follows: Page 121 of the DEIR contains the statement that one of several reasons given for the increase in average household size in Central City West is "due to the continuing demolition of units in and around the study area." The unqualified reference to the demolition of units as a contributing cause of the overcrowding in the area should be limited to those units demolished after February, 1988. Furthermore, this statement should be limited to

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demolition of housing units to provide for development and not to include demolition pursuant to City orders to demolish.

Section IV.C.1 of the DEIR (page 128), under the subheading "Priority for Displaced Residents", states the individuals who "have been or will be displaced through the removal of housing" will have priority as to new affordable units produced under the Specific Plan. Once again, this reference should be limited to displacements after February, 1988, and refer to individuals displaced due to housing removed for development, rather than including units removed pursuant to City order to demolish or bring units into earthquake compliance.

Section IV.C.2 of the DEIR addresses housing affordability. Page 132 of the DEIR, under the heading "Environmental Impact," states that the Specific Plan Affordable Housing Program is designed to work with the job/housing program and repeats the three goals as discussed in Section B.1. of this letter. The same revisions should be made to the second expressed goal, as suggested in Section C.1. (2) of this letter.

Response: On the contrary, the demolition of housing for whatever reason contributes to the worsening housing deficit and must be redressed through housing construction. See responses to Comments 32.a and 32.b.

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33. Commentor: Daniel P. Garcia and Michael S. Woodward
Munger, Tolles & Olson

February 16, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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34. Commentor: Michael S. Woodward
Munger, Tolles & Olson

February 16, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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35. Commentor: Terry Lee
Cathay City Property Management, Inc.

February 16, 1990

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[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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36. Commentor: Maria Marco

February 12, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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37. Commentor: Walter Nemeth

February 14, 1990

Comment 37.a: Traffic. According to the figures in the draft EIR the Hollywood, Harbor and Santa Monica freeways are as of this time taxed beyond their capacities in the AM and PM peek hours, so improving access to either or all those Fwy's will only further the congestion and can only result in a total collapse of our Fwy system in the Downtown L.A. area.

The intersection at Glendale and Temple has a F. rating by the transportation research board now! Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of intersection approaches. Tremendous delays with continuously increasing queue lags. Adding one more lane to feed this intersection and then taking one lane for a HOV lane on the north of it will sure spell disaster.

I am not sure if you looked at your own figures, you are proposing 100,100 new jobs by 2010 and 7,040 dwelling units just to take the correct figures, if 50% of the new jobs car pool at 2 person per car you will end up with 46530 new cars in CCW, and if only 1/4 has to go to the Golden State Fwy you will add 11632.5 cars to an already failing intersection and this does not consider other development in greater Downtown L.A., or traffic using the Hollywood Fwy. there is no other alternative as to widen Glendale Blvd. from Beverly to Sunset and Glendale from Alvarado to the Glendale Fwy. The traffic study in this EIR is flawed and definitely needs a major revision.

In addressing your Water, Power and Sewers as noted in your EIR, there will be no way the Hyperion Treatment Plant, overtaxed as it is, can handle the existing Demand and will be way beyond its capabilities, even if all the existing structures retrofit to the greatest extend. A drought of two years will put our water supply in jeopardy and not only affect the C.B.D. but all of L.A. County.

III. Response to Comments

Response: On the contrary, the Specific Plan and DEIR have accounted for the traffic impacts of growth; traffic volumes on the Pasadena Freeway would increase by 200-600 cars per hour during the PM peak, depending on the effectiveness of the TDM program (MT3-MT2 conditions, respectively), as shown in Table 32 (p. 187). Although over the near-term, the DEIR indicates that development must be phased relative to remaining sewage treatment capacity at Hyperion (p. 307), adequate long-term capacity is anticipated to come on-line by the mid-1990s.

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38. Commentor: Fred H. Alschuler
Alschuler, Alschuler, Alschuler & Alschuler

February 9, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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39. Commentor: Fred H. Auschuler
Alschuler, Alschuler, Alschuler & Alschuler

February 15, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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40. Commentor: Fred H. Auschuler
Alschuler, Alschuler, Alschuler & Alschuler

February 15, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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41. Commentor: Fred H. Auschuler
Alschuler, Alschuler, Alschuler & Alschuler

February 15, 1990

III. Response to Comments

Comment 41.a: The enclosed report evidences that establishing the proposed First/Second Street District Park would: (a) constitute a danger to pedestrian traffic; and, (b) disrupt the flow of traffic on those streets which are to be the main arterials between Central City West and the Downtown Central Business District.

Response: On the contrary; the Specific Plan calls for development of a First/Second Street District Park of 1.75 acres (DEIR, pp. 35, 48-49, 285, 287) within a total district parcel area of over 10 acres (a total district block area of 18 acres). Upon siting of the park, the plan will provide for functional and safe pedestrian access.

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42. Commentor: Edward J. Ruzak, RCE

February 12, 1990

Comment 42.a: I have completed a study of the practicality of providing a neighborhood park in the Central City on a 1.75 acre area in the 1st, 2nd, Beaudry, Bixel area. In brief it is my opinion that the park is impractical from a traffic engineering standpoint and will pose dangers to pedestrians trying to cross the numerous major streets that boundary or bisect the proposed park. The numerous pedestrian crossings will also add to the current congestion problems the 1st-2nd street corridor. I have reviewed the summary of the Revised Preliminary Central City West Specific Plan, dated November 2, 1989. The proposed park is in the 1st/2nd street district. It would create 1.75 acres of neighborhood park. The plan states that the park is to serve as a resource for residential uses and commercial tenants on Crown Hill and the Temple/Beaudry neighborhood (preliminary plan page 61).

The area in question is bounded by 1st street, 2nd street and Beaudry Avenue on the westerly entrance to Los Angeles Central City. The streets that exist or proposed in this park area are arterials or secondary streets that are five and six lane facilities. The 1st/2nd street corridor is a main east/west corridor into the Central City. Boylston street will bisect the park and will be a six lane road divided by a median. It will have an arterial street classification. Bixel Street will be a proposed secondary street of five lanes and will bisect the park also. (Preliminary plan figure 3.4, pg 47, pg 54 & pg 56.)

It would be a hazard, in my opinion to have pedestrians of young middle aged and older being forced to cross these many major arterials and secondary streets in order to reach the park.

Response: On the contrary; the Specific Plan calls for development of a First/Second Street District Park of 1.75 acres (DEIR, pp. 35, 48-49, 285, 287) within a total district parcel area of over 10 acres (a total district block area of 18 acres). Upon siting of the park, the plan will provide for

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functional and safe pedestrian access.

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43. Commentor: Fred H. Auschuler
Auschuler, Auschuler, Auschuler & Auschuler

February 8, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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44. Commentor: James G. Dahlgren, MD

February 7, 1990

Comment 44.a: I am informed that the Central City West Specific plan proposes the development of a 1.75 acre public park in the First /Second Street District. I am further informed that this proposed park is to be located in an area which is triangular in shape, being three blocks in length and a maximum of one block in width. (Summary of the revised Preliminary Central City West Specific Plan dated November 2, 1989, [the "Plan"] Fig. 2.7 p.31, p.61.)

The area in which the public park is to be located is to be surrounded by major six lane highways (First Street, Second Street, and Beaudry) and bisected by another major six lane highway (Boylston) as well as a secondary five lane highway (Bixel). (The Plan, Fig. 3.4 p.47, p.54, p.56.)

It is my opinion that locating a public park as proposed may pose a significant health hazard to persons using the park. It should be reasonably anticipated that the air quality at the park would be significantly and adversely impacted as a result of the heavy traffic surrounding the park. Therefore, it is my opinion that a park should not be located at the proposed site.

Response: On the contrary; the Specific Plan calls for development of a First/Second Street District Park of 1.75 acres (DEIR, pp. 35, 48-49, 285, 287) within a total district parcel area of over 10 acres (a total district block area of 18 acres). Upon siting of the park, the plan will provide for functional and safe pedestrian access.

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45. Commentor: Tom Eilken, Property Owner

February 21, 1990

III. Response to Comments

Comment 45.a: My office building is located within the First/Second Street District. It is at the northwest corner of Second and Bixel Streets. It is part of what has been set out in your plan as a small 2-block area comprising 1.75 acres for a neighborhood park. This I will explain after we first look at the merits, or should I say, lack of merits, as to placing a neighborhood park at this location.

First, is the severe, speedy, and dangerous traffic that the two adjacent primary highways currently generate, let alone, what will be generated when all the additional development downtown adds many hundreds of vehicles to these two major arterials. First and Second Streets, which front on both sides of our 2 commercial blocks, are identified as primary highways. Additional widenings are yet to occur. A neighborhood park in this location would not safely serve the adjacent residential areas as claimed. A park here will automatically be an attractive nuisance to invite children and mothers from the dense residential developments on both sides of these heavily traveled arterials. Placing a park here just does not make sense from any planning or safety standpoint. These 2 blocks are already commercial blocks by use and are shown on your zoning map 2-2, page 31, as C-2. Then why the park?

Second, this so-called neighborhood park is only 1.75 acres. Certainly that is not large enough to be classified as a neighborhood park for residential use. Is it really a mini-park for the benefit of the Water and Power site adjacent thereto? The Water and Power site is 8.44 acres. It has been discussed for sale and for highrise development to private developers over the past few years. Call in the Water and Power officials. Make the thorough investigation public. This is public information, and it should be made knowledgeable to the public in your report. What has been developing in this regard relative to plans that have been sketched and discussions that have been had regarding the future disposal of that property by the City? The Water and Power use on those 8-1/2 acres is currently an industrial-type use which eventually will have to be relocated to inexpensive acreage elsewhere after it is gobbled up by developers for both their benefits in Central City West -- Water and Power as to sales prices, and the developers for future income.

Its future is clearly identified by the zoning you have given it on your Map No. 2-2, which is C2-2 with a 6:1 density. This amounts to 2,206,000 SF of rentable building space. Move it down to 4.5:1 density and require it to produce its own commercial-use mini-park upon development. Assign a small portion of it and increase our 1.75 acres from 3:1 to a 4.5:1 density and even us out. Such a shift would result in a net reduction of more than one-half million SF of building density for that Water and Power site and would still leave the Water and Power site for 1-1/2 million (+) SF for its sale purposes.

A commercial mini-park to serve its own commercial development is reasonable. But a neighborhood park should not be placed between two major highways which are two of the main arterials to the west and north in and out of the Civic Center and the Financial

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Center.

The General Plan identifies mixed use areas across the street from our small commercial triangle and further states that a neighborhood park on our site would be a "link" to Crown Hill across the highway to the south. Crown Hill is scheduled for its own mini-parks and open space and neighborhood park.

Also, it would be a "link" to Temple-Beaudry across the highway to the north. Temple-Beaudry will have its own 2-acre park and mini-parks, as well as open space.

A so-called neighborhood park in the First/Second Street District will be for the ultimate benefit of the developers of that Water and Power property. Those 8-1/2 acres will eventually be purchased with your proposed park on our properties adjacent to it -- obviously an amenity for those owners, those lessees, and the employees of those developments.

This district does not need to provide its own buffer or provide one for others. It is made singular by the City's street and highway plan and by your own designation that it is a district unto itself.

Reduce the 6:1 on the fragment block and on the Water and Power site, to say, 4.5:1 density and apply just a very small portion of the savings to our 2 small blocks, allowing us equal stature at 4.5:1.

You will reduce the criticized high density of the plan by more than 1/2 million SF and provide adequate balance, equity, and fairness as it should be.

Last and final, let me address the legal consequences of placing a park on our two blocks.

All properties located therein would be frozen as to use and development. After having designated and approving us as a park, the City still would not be in a position to condemn us for many years. For an example, the widening plans and specifications for the critical 2 blocks of First Street between Beaudry and Bixel have now been delayed budgetwise for some 12 years.

Six months ago, I turned down \$100 per SF for my partnership's small parcel. There is also a recent legitimate sale in my block at \$92 per SF.

Will the City pay out \$8 million to \$10 million for this land for a park? Will the City pay millions for the loss of goodwill for the long-established businesses there? The obvious answer is no.

If set forth as a park, as proposed, our properties would be unmarketable, undevelopable, unsalable at a fair price, and usable only for their present existing uses. We could not

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even obtain a building permit.

I know whereof I speak when experiencing a similar situation in 1975 to 1981 with other downtown property we had in Civic Center. I, and a dozen other owners, would be forced to file a class action to preserve our rights -- a class inverse condemnation action -- as well as possible other civil actions, plus whatever other claims that may be made.

Response: On the contrary; the Specific Plan calls for development of a First/Second Street District Park of 1.75 acres (DEIR, pp. 35, 48-49, 285, 287) within a total district parcel area of over 10 acres (a total district block area of 18 acres). Upon siting of the park, the plan will provide for functional and safe pedestrian access.

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46. **Commentor:** Kirby L. Hamman, General Partner
5th Street and Maryland Street, Ltd.

February 22, 1990

Comment 46.a: I am writing you on behalf of "5th Street and Maryland Street, LTD," a California Limited Partnership. Since March of 1981 we have owned and operated 2 apartment buildings located in the area of the Central City West Specific Plan. One is a 35 unit building located at 1329 W. 5th Street, the other is a 37 unit building located at 1326 Maryland Street. These are located in the block that is bounded by Bixel Street to the east and Lucas Street to the west. At great expense, the Partnership has renovated all of the apartment units, installed new electrical systems, installed new heating systems, improved the plumbing systems and has undertaken many other rehabilitation projects too numerous to detail in this letter.

Thus, having studied the plan so far, I must express to you my concerns for the above referenced properties: (1) We are already bounded on the west end of the block on Lucas Street, from Maryland Street to 5th Street, by a commercial development, the Los Angeles Sheet Metal Workers' Building, an office building and training center. (2) We would be bounded on the east by commercial development as I can discern from the plan. (3) The building at 1329 W. 5th Street has its zoning changed from C2-2 (commercial) to R5-2 (residential). (4) The building at 1326 Maryland Street has its zoning changed from R5-2 to RC5(CW)-2-D. (5) Our properties are located one-half block from Bixel and one block from 6th Street. (6) We have not seen one pro-forma plan for the development of R5-2 or RC5(CW)-2-D. Have these been developed and where can we obtain these? (7) The Partnership's greatest concern is that we might be sandwiched between two commercial developments that could result in our properties being undvelopable and unmarketable.

Response: Table 78 of the DEIR (pp. 399-400) presents pro-forma analyses of residential and non-residential developments given varying land costs and

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development intensities. Included in the analysis is apartment and condominium scenarios.

The zoning designations assigned to these properties in subareas 805 and 825 of the CCW Specific Plan map of Recommended Zone Changes (Prepared by the City Planning Department, January 1990) - high-density residential and mixed-use commercial and high-density residential - provide for transition between existing commercial and residential areas, and should not sandwich a residential zone between two commercial zones.

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47. Commentor: Bruce D. Harrison, Certified Property Manager
The Beaumont Company

February 22, 1990

Comment 47.a: I manage 1301 W. 2nd Street in Los Angeles for the owners of that property. I was informed today by telephone by another property owner, that there are plans for a park where 1301 W. 2nd Street is located. Neither the property owners nor myself have been informed of this plan until I heard rumor of it today over the telephone. On behalf of the property owners we object to any such plans until further review and notification. We would appreciate any further information regarding the above mentioned case number and property address.

Response: The Specific Plan calls for development of a First/Second Street District Park of 1.75 acres (DEIR, pp. 35, 48-49, 285, 287) within a total district parcel area of over 10 acres (a total district block area of 18 acres), and has not sited the park on any specific parcel.

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OTHER ORGANIZATIONS AND INDIVIDUALS

48. Commentor: Karen Jaeger, President
Inner City Alliance

February 8, 1990

Comment 48.a: Historically, Glendale Boulevard has served the Echo Park Community in several important ways: 1) As the only major north/south street connecting downtown and the area north of the Los Angeles River; 2) As a retail shopping center; 3) As a major community thoroughfare; and 4) One of the early centers of motion picture production in Los Angeles.

It is our fear that the build-out from CCW will cause further deterioration to the quality of life in Echo Park. We do not deny the rights of the developers of CCW to develop their property, but when that development comes at the expense of an existing community, the rights of the existing community 'a priori' should take precedence. Any existing community should not and, in the case of Echo Park, will not bear the burden of the development of a new community.

Problems Implicit in CCW Build-out. Traffic mitigations outlined in the CCW draft are simplistic, unrealistic and meaningless. Recent policy proposals of the AQMD require the City to remove all internal combustion-powered vehicles from the downtown area within two years. Traffic mitigations outlined in the CCW draft provide the means for almost twice the number of vehicles that now travel through our community, a direct contradiction of the AQMD's policy. This cannot go unchallenged.

Response: On the contrary, the transportation improvements programmed under the Specific Plan for the Glendale Boulevard interchange of the Hollywood Freeway incorporate measures to reduce the potential for traffic intrusion into the Echo Park community. The reconfiguration of the northbound off-ramp avoids the current situation of traffic filtering through this residential neighborhood and provides the opportunity to increase the contiguous open space area of Echo Park.

The Air Quality Management Plan does not call for removal of internal-combustion vehicles from the downtown area within two years, however, it does call for the following penetration rates for alternative fuels and electrification regionwide: passenger vehicles 40% to use electricity or methanol by 1998, and 100% electrification by Tier-3 Plan implementation; heavy-duty vehicles 70% to use methanol by 1998, and 100% to use methanol by Tier-3 implementation; fleet vehicles 20% electrification by 2000, and 80% to use methanol by 2000; transit buses 30% electrification by 2007, and 70% to use methanol by 2007.

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Two measures included in the Specific Plan will facilitate achievement of these AQMP objectives. Requirements for employer transportation management plans provide a mechanism for implementation of alternative fuels for fleet vehicles and commute vehicles. Specific Plan emphasis on transit system development and patronage will contribute to the chances for success of the SCRTD program to add methanol buses.

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49. Commentor: Karen Jaeger, President
Inner City Alliance

February 15, 1990

Comment 49.a: There are several legal issues to be considered as well as the content of the Plan. According to the state law which mandated the community planning process, Specific Plans are intended to implement a portion of a Community Plan, not amend it or have the effect of amending adjacent Community Plans. Altering a Community Plan illegally with a Specific Plan is particularly questionable when the community Plans affected are long overdue for review, a process requiring citizen participation. Densities, especially along Temple and Third, may also violate recent state law.

Response: The State law which requires consistency between zoning and general plan designations (AB283) required the City of Los Angeles to revise and amend both zoning and community plan land use designations, and this has been done through a process separate from the Specific Plan, citywide. The Specific Plan implements the Westlake Community Plan element of the General Plan as explained in the Land Use section of the DEIR (pp. 92-94), as development of a Specific Plan was called for by the 1974 Westlake Community Plan. The process for development of the CCW Specific Plan included public participation through review and comment of intermediate plan products at community workshops and public hearings. Plan densities for residential and non-residential uses do not violate any laws, and are reduced by 42% from the Community Plan.

Comment 49.b: Then we deal with the unspoken curse of this entire process: the fact that so much time and effort have been spent developing this one concept that in effect you have nothing else to consider. Will the prospect be so daunting that you will feel you must vote for this Plan? Can you not ask that other alternatives or at least one alternative be presented?

Response: Alternative approaches to solving the problems of Central City West area as well as the greater Central Business District have been considered all through the plan development process. Most recently, the

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Draft EIR regarding the Specific Plan evaluated six alternative approaches to development of the Central City West area (DEIR pp. 370-432); the proposed plan was identified as the environmentally superior alternative. Finally, through public agency review of transportation proposals of the Specific Plan, discussion of alternative approaches has resulted in refinements which may reduce costs while providing for more effective and feasible facility improvements.

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50. Commentor: Karen Jaeger, President
Inner City Alliance

February 15, 1990

Comment 50.a: It is understood at this time comments will pertain only to the EIR but the Inner City Alliance wishes to register a protest, calling the Central City West Plan a Specific Plan is a misnomer. A Specific Plan is intended to implement a portion of a Community Plan and is not intended to provide an excuse to change a Community Plan without full participation of the complete community. It is a violation of the Community Plan process.

Response: See response to Comment 49.a.

Comment 50.b: DENSITY AND LAND USE. The EIR does not address the environmental impacts of increases in potential land-use density of the Central City West plan over the land-use designations in the Westlake Community Plan. Increases in land-use entities will potentially give rise to adverse environmental impacts such as increased traffic, parking requirements, increased demands on infrastructure, including sewers, etc.

Significant portions of the Central City West Specific Plan (so-called) increase proposed land-use densities at potential build-out over those provided for in the Westlake Community Plan: the area south of Temple and west of Beaudry; most of the area bounded by Second Street on the north, Glendale Boulevard on the west, and Boylston on the east north of Third Street; and a parcel of property at the northwest corner of Ninth Street and Garland all provide for greater F.A.R. than that permitted in the Community Plan.

The vertical zoning "combination of residential and commercial zones" which is located mainly along Temple and Third Streets substantially increases permitted entities in those strip commercial areas. Because those areas are now limited to 1.5 F.A.R., the Specific Plan would almost double the permitted density on those properties. Nowhere is the environmental impact of those changes addressed.

In addressing the issue of increased land-use densities, it is inappropriate and misleading to

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emphasize, as some employees of the Planning Department have, the overall reduction in densities which the proposed Specific Plan would enact in comparison to the existing Westlake Community Plan. DKS Associates concluded in its April 10, 1989 publication, "Implication of Build-Out on Transportation System," that: "The build-out forecasts [based on the Community Plan] show that traffic volumes would be significantly higher than the capacity of the roadway system." (at page 13) It is disingenuous to argue that the Specific Plan would reduce land-use densities when it is admitted that the current permitted densities are wholly unrealistic and unworkable.

Response: On the contrary, the DEIR (pp. 72-369) discusses in detail the impacts of the proposed Specific Plan. Overall, the Specific Plan reduces commercial entitlements from 40.3 million square feet under buildout of the Community Plan to a cap of 25 million square feet under the Specific Plan (DEIR p. 89). However, to address the need for housing production raised in the Community Plan, and to implement regional job-housing balance programs, the Specific Plan increases residential densities to allow for some 14,450 units, compared to 8,050 under the Community Plan. Environmental impacts of these changes are thoroughly discussed in the DEIR.

The citation from "Implication of [Community Plan] Build-Out on the Transportation System" only serves to emphasize the need for both the limits on commercial density and the transportation improvements called for under the Specific Plan. That analysis was produced early in the plan process to identify where land use impacts were most severe, and where initial improvements were needed to address regional through and CCW traffic growth.

Comment 50.c: The narrow focus of the Specific Plan process has obfuscated the growth-inducing and other environmental impacts on areas adjacent to the CCW Plan. The CCW Plan deals only with a small portion of the existing Westlake Community Plan. By limiting the planning process to a fraction of the Community Plan area, growth-inducing and other environmental impacts on adjacent areas are ignored. This is reflected in the EIR, which does not address such impacts on areas surrounding the Specific Plan area.

The most glaring example is the low- and moderate-income housing immediately to the west of the Specific Plan area. Current plan and zoning land-use allows much denser development than the current use. Unless some action is taken prior to Plan adoption, that resource is threatened with redevelopment. The loss of all that affordable housing is an environmental impact which should be addressed in the EIR. The most appropriate and meaningful mitigation measure which should be considered is an ICO throughout the Westlake Community Plan area until the community Plan revision process is completed for that area.

Response: On the contrary, the EIR utilizes a secondary study area around

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CCW as a general framework for discussion of cumulative and growth-inducing effects of the plan. This area extends to Hoover on the west, Stadium Way on the north, the Los Angeles River on the east, and the Santa Monica Freeway on the south (DEIR, pp. 25, 27, 58-59). The DEIR (p. 368-369) also summarizes the detailed discussions of cumulative effects on each environmental subject area (pp. 72-367).

Comment 50.d: Replacement Housing. The major impact of the Housing Component overlooked in the Draft EIR is the location of replacement units being located in the Secondary Placement Construction Area. The potential minimum number of units constructed outside CCW is 2,050 (1/2 of the Commercial Replacement - 500, 1/2 of the Commercial Linkage fee units - 200 and 1/2 of the Residential Development Replacement units - 1,050). One of the major problems with this Plan is that so many adjacent communities must bear the brunt of CCW's meeting its commitments for traffic mitigations, replacement housing formulae, etc. This is being proposed without regard for the fact that the Secondary Placement Construction Area is located in communities that are long overdue for community plan revision and is committing these community plan areas to housing which may or may not conform to these communities' needs.

The position of the Inner City Alliance is that replacement housing for CCW residential must be built within the confines of CCW. We of the Inner City are tired of having our neighborhoods obliterated and replaced with middle and/or upper income communities. We are willing to share our neighborhoods. We are not willing to be removed.

Response: The Housing section of the DEIR (p. 128) indicates that up to 50% of the units produced under the Commercial and Residential Replacement components may be located in the Secondary Replacement Housing Area (1,550 out of the 7,700 units anticipated under the plan).

Comment 50.e: Commercial Replacement Units. Commercial subsection d states that commercial replacement units constructed for units demolished after implementation of this Plan shall be provided at a rent level equivalent to that of the units demolished. Does "rent level" mean a categorical level such as "very low income dwelling" or "low-income dwelling unit" or does it mean the equivalent dollar amount of the rent of the lost unit?

Residential Development Replacement Units. The largest number of affordable units to be produced by this plan as set forth in the July, 1989, and November, 1989, plan proposals were to come from the Residential Development Replacement Housing Component; fully 2,100 of the total 5,300 units to be produced. These units were to be "provided at rent levels equivalent to those of the units demolished." However, the ordinance changes this so that the replacement units are low income dwelling units only, not very low income dwelling units. This benefits the developer and not the displaced, 60% of whom can only afford very low income units.

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Response: See response to Comment 50.g.

Comment 50.f: Linkage Fee. The establishment of a CCW Affordable Housing Linkage Fee" is a necessary and important innovation in Los Angeles planning and should be applauded. Due to the citywide housing crisis, the CCW Housing Trust Fund should be maintained as long as monies generated by new development are unspent. Subsection C-1d should be deleted. This section allows for Fund monies to be returned on a "first in-first out" basis after 2,000 units are produced. The idea of allowing the earliest developers to contribute a "refundable" fee not permitted development in the later phases is patently inequitable. Also the 2,000 unit cap on units produced by the Fund is very questionable. The language of the ordinance is unclear where it refers to "by this Section" which could be construed to be Section 14 (which covers both commercial and residential replacement units estimated at 5,300). Likewise, if the 2,000 refers only to the Commercial component, then it is still wrong. The proposed plan sets forth two forms of Commercial Development-produced affordable housing units: Replacement Housing and Linkage Fee housing. Both were estimated to produce a minimum of 1,000 units each. Where affordable housing is concerned, more is better. There shouldn't be a cap on the number produced by the Housing Fund. Subsection C-1d should be deleted.

Response: Comment acknowledged.

Comment 50.g: Affordable Unit Priority. Consideration must be given to what mix of affordable housing the Fund will need to produce and the extent of the subsidies required. Section D mandates that constructed units "shall be made available" to displaced households. But at what rent? At a rent level equivalent to the household's demolished unit? HUD will allow \$425 for a very low income unit for a family of four. But what if that family was previously paying \$300? The consultants have estimated that 56% of the Plan area's current households earned less than \$10,000 per year in 1988. If a commercial project must replace a demolished unit (after the effective date of this plan) for a household earning \$10,000 and paying \$300 a month rent, is that project required to produce a unit to rent at \$300 a month or is it simply required to produce a very low income dwelling unit which can rent for \$425?

Special care must be given to assuring that affordable units created by this Plan are made available to the displaced at rents they can afford. The draft ordinance allows residential developers to replace hundreds of very low income units with new low income units. The Commercial developer must replace very low income units with very low income units, but it's not clear that the developer must rent to an ultra low income displace household. If this gap is not addressed by restructuring the requirements on both commercial and residential development. The CCW Housing Trust Fund will need to provide the remedy by producing a disproportionate share of very low income units and providing extraordinary subsidies. This section should clarify that units for the displaced will be available at rent affordable to them on a priority basis. The expected burden on the Fund should argue for deleting Subsection C-1d.

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Response: Affordable units will be made available at rates established by the US Department of Housing and Urban Development (HUD), as follows: low-income rents cannot exceed 30% of 60% of the Los Angeles County median monthly income; very-low-income rents cannot exceed 30% of 50% of the Los Angeles County median monthly income (the median household income for a Los Angeles County family of four based on 1990 HUD standards is \$38,900). Therefore the following maximum rents would apply for 1990:

<u>Unit Type</u>	<u>Median Income</u>	<u>Maximum Rent</u>	
		<u>Low</u>	<u>Very-Low</u>
SRO	\$20,438	\$306	\$255
Studio	27,250	409	341
1-Bedroom	31,100	467	389
2-Bedroom	35,000	525	438
3-Bedroom	38,900	584	486
4-Bedroom	43,750	656	547
5-Bedroom	48,650	730	608

Comment 50.h: TRANSPORTATION. There are two basic problems with the transportation mitigations written into the CCW Plan: the unreasonable burden placed on surrounding communities for providing CCW with vehicular access at the expense of circulation and environment in those communities and the environmentally threatening precedent of putting freeway traffic on community streets.

Transportation planners have contended that widening streets and creating more freeway space merely provides more space for vehicles and rapidly attracts more vehicles to fill that space. Many community streets outside the boundaries of CCW will be widened from two to four or in some instances six lanes to facilitate traffic flow to and from CCW. Yet streets leading into the residential component of CCW will be reconfigured to limit access. The rule of thumb seems to be to protect the streets of CCW while disrupting traffic flow and access in surrounding communities. We must protest this cavalier attitude on the part of the developers to the needs of the surrounding communities. Our neighborhoods do not exist to serve the transportation needs of CCW. If CCW can not be built without causing severe disruption of traffic access and flow in the surrounding communities, it ought not to be built.

Response: Transportation improvements included in the Specific Plan provide measures to limit traffic volumes through transportation demand management (TDM) as well as a combination of roadway and transit facilities to address the existing and future potential for congestion in and around the CCW area. The cost of facility improvements has been allocated

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based on the share of each facility's demand contributed by CCW, CBD and regional demand. The efforts to implement TDM and to allocate cost shares ensure that roadway widenings are minimized and that unreasonable burden is not created.

Comment 50.i: What is variously described in the EIR as a Busway or Transitway is in reality nothing more than an old freeway diamond lane. No matter how it's dressed up linguistically, the proposed Glendale Boulevard HOV/Busway and Harbor Freeway Transitway are nothing more than subterfuge for establishing a community street as an unnamed freeway. Stage one of this plan would connect the Harbor and Hollywood Freeways via the Bixel Street Transit Mall. This would bring freeway traffic into the community on Glendale Boulevard as far north as the Hollywood Freeway. The second phase calls for the construction of a carpool lane on the Glendale Freeway and will dump this traffic on the already over-burdened north end of Glendale Boulevard. Portions of this entire street will be dedicated to commuter traffic for a minimum of eight hours per day. The community will lose access to and use of this street for the greater part of each day. These traffic mitigations will adversely affect these communities by increasing traffic on surface streets, turning surface streets into unnamed freeways and encouraging increased use of pollution producing cars and buses. Much of this increased traffic will travel past Echo Park, a major community recreation resource, limiting access to the park. There will be increased noise as well as pollution from this additional traffic. These mitigations in effect become a regional traffic plan without involving a regional planning process. The CCW tail will wag the entire planning dog.

Response: Addition of HOV lanes does not add traffic to areas. Studies of the effects of the El Monte Busway indicate that it results in a total facility (HOV plus mixed-flow lanes) which moves more people in fewer cars with less congestion overall.

Comment 50.j: Policy Statement on the Glendale Boulevard Corridor as Affected by Central City West (CCW) Build-out. Community Concerns. Historically, Glendale Boulevard has served the Echo Park Community in several important ways: 1) As the only major north/south street connecting downtown and the area north of the Los Angeles River; 2) As a retail shopping center; 3) As a major community thoroughfare; and 4) One of the early centers of motion picture production in Los Angeles.

It is our fear that the build-out from CCW will cause further deterioration to the quality of life in Echo Park. We do not deny the rights of the developers of CCW to develop their property, but when that development comes at the expense of an existing community, the rights of the existing community 'a priori' should take precedence. Any existing community should not and, in case of Echo Park, will not bear the burden of the development of a new community.

Problems Implicit in CCW Build-Out. Traffic mitigations outlined in the CCW draft are

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simplistic, unrealistic and meaningless. Recent policy proposals of the AQMD require the City to remove all internal combustion-powered vehicles from the downtown area within two years. Traffic mitigations outlined in the CCW draft provide the means for almost twice the number of vehicles that now travel through our community, a direct contradiction of the AQMD's policy. This cannot go unchallenged. Any Plan or technology that does not address this issue can only fail and will be subject to an Environmental Impact Review.

Response: See response to Comment 48.a.

Comment 50.k: The entire length of Glendale Boulevard from First Street to the Glendale Freeway must be treated as a whole. Any plan to modify any part of this street must be considered in relationship to the whole. Since Glendale Boulevard is designated as a state highway, hearings with Cal Trans must be held before any changes are made on this street.

The Community firmly opposes the following: 1) Widening all or part of Glendale Boulevard; 2) The use of reverse-lane traffic management; 3) Elevated busways; 4) Any infringement or disruption of Echo Park and Lake recreational facilities; 5) Any reduction of Community access to or usage of Glendale Boulevard and its businesses and services; and 6) Any reduction of the planted medians unless they shall be used as right-of-way for light rail.

Response: Glendale Boulevard has been considered as a whole in planning of transportation needs and improvements. Caltrans is currently reviewing proposed Specific Plan proposals. With regard to specific points of opposition: (1) Glendale Boulevard right-of-way is not planned for widening north of the Hollywood Freeway; (2) Reversible lanes are not currently under consideration for the Specific Plan; (3) Elevated busways are not currently under consideration on Glendale Boulevard north of the Hollywood Freeway; (4) The plan recommends measures to improve the provision of contiguous open space at Echo Park and its facilities; (5) The plan does not propose measures to reduce access to Glendale Boulevard; (6) The plan does not propose the reduction of planted medians.

Comment 50.l: Suggested Solutions to Commuter Traffic Problems. Rather than concern themselves with 'mitigations', the Community prefers that planners and developers think in terms of 'improvements'. To that end, the following suggestions are made:
• Terminating the Glendale Freeway (2) at the Golden State Freeway (5) and creating a park-and-ride facility at this point as a first step in getting commuters to use public transit to commute to downtown; • Restoring light rail service between downtown and this facility.

Response: Agreed; provision of rail transit service may be possible if support could be garnered from the community; the HOV facility proposed

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under the Specific Plan could be a potential first leg of this route. Feasibility of such a program in terms of cost, ridership, environmental effects and engineering must be analyzed. Nevertheless, such a system is not required to mitigate significant impacts of the plan, but would instead contribute additional strength to the transit program.

Comment 50.m: Utilizing the abandoned rail yards in Atwater and north of Chinatown as a transportation corridor to route commuters around Echo Park and Elysian Park;

- Improving community access to and use of businesses and services located on Glendale Boulevard by restricting commuter and Dodger Stadium traffic on this important community thoroughfare; and
- Encouraging the redevelopment of Glendale Boulevard as a community retail center.

Response: These measures are beyond the scope of the Specific Plan.

Comment 50.n: The Community requires all three of our Councilmembers to take an equally active part in protecting the environment and quality of life in Echo Park by supporting the above stated community positions and working to implement them. Since Glendale Boulevard is designated as a state highway, we also call upon our state representatives to become actively involved in protecting our Community by watchdogging the development of this street. The Community can no longer tolerate the subordination of its interests to those of the powerfully connected downtown developers.

Response: Comment acknowledged.

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51. **Commentor:** Sallie W. Neubauer, President
Citizens Committee to Save Elysian Park

February 14, 1990

Comment 51.a: First and foremost, it should be noted that all traffic impacts of the proposed Specific Plan are calculated on the assumption that Metro-rail and other light rail lines are completed. In fact the future funding of Metro-rail in particular is very up in the air. There is no guarantee of reduced traffic. The assumption that a set number of residents in the area will work in the new commercial space is speculation. Low and low-moderate income families will continue to work in factories, and this plan does not call for factories. It does not matter how many figures are pushed around. One only has to experience going to and from the Central Business District (CBD) during peak hours to understand that our streets and freeways are at more than capacity now. In the Plan there was mention of an I-5 to Alameda to Spring Street bypass that could ease congestion. Why has discussion of this option not been included in the Draft Environmental Impact Report (DEIR)?

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Response: On the contrary, the regional transportation improvements included in the needs analysis of the transportation study include only those improvements for which funding has been secured, as designated by SCAG, Caltrans, LACTC and SCRTD. The Specific Plan transportation improvements build off of this base, and include those facilities which are required to form an integrated system to serve CCW, for which CCW developer fees would contribute funding. These include (under the M2 scenario) the Alameda Bypass, which is called out in the DEIR (p. 180).

Comment 51.b: One must look at the big picture. No matter how you look at it, this Specific Plan is just too dense for the area. Besides air problems caused by more traffic, what about sewer problems? Our treatment plants are operating at capacity now. Even with their newly expanded capacities, will they be adequate for this and two or three other huge projects being planned for the City (Porter Ranch, Playa Vista, City North)? According to the California Environmental Quality Act (CEQA) potential sewer impacts must be discussed in the DEIR. (They are not.) The DEIR is also in violation to CEQA in that it does not identify City North as a related project in the vicinity and discuss the cumulative impacts that might occur.

Response: Potential impacts are assessed in the Draft EIR, including Air Quality (pp. 229-246) and Sewers (pp. 304-311). Related projects are cited in DEIR section III.B (pp. 58-71). Current proposals north of the CBD are reflected in projects 1-8 of this list. Total growth forecasts utilized in the transportation, air and noise analyses are based on SCAG forecasts for the region which include these individual proposed projects, as indicated in the DEIR (p. 58).

Comment 51.c: Furthermore, the Citizens Committee to Save Elysian Park (CCSEP) does not believe that the arguments for choosing the project as the Environmentally Superior Alternative are valid. For example, the DEIR states that although Alternative 1 - No Project would "reduce built area of development within the plan area...it would not have the capacity to program needed transportation improvements..." (p. 422). As we have already noted, the project as proposed does not have the capacity to generate 40% of the funds needed for transportation improvements. The DEIR is seriously flawed in that it presents no fall back position if the plan cannot evolve as presented.

Response: The No Project scenarios (Alternatives 1-3) are representative of the potential fall back positions which would apply should the plan not be adopted. It is because of the existing and continuing environmental issues around which the Specific Plan was formulated, which would not be addressed under a No Project Alternative, that the No Project Alternative is not clearly environmentally superior to the proposed Specific Plan.

Comment 51.d: CCSEP is concerned that the plan does not provide for either adequate or

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properly located parkland. Regarding parks, the DEIR outlines the city's policy as stated in the Service Element of the Los Angeles City General Plan, adopted October, 1980. It recommends 10 acres total recreation facilities land per 1,000 persons. It states that a total of 4 acres of park, both neighborhood and community, should be created for every 1,000 residents. The Los Angeles General Plan specifically states that these standards are to be used in "redevelopment of blighted residential areas" (p. 283) which accurately describes the Specific Plan area. Why has this formula been summarily diminished to 1 acre per 1,000? This is one fourth of what our city recommends. The Central City West (CCW) plan estimates a residential increase of 18,000. The CCW park formula represents a reduction from 72 to 18 acres of park land!

The DEIR states that achieving the recommended acreage could be difficult because of lack of funds (p. 283). Why can't the developers pay a percentage of their assessed land value as a fee so that land for parks could be purchased? If the developers are to pay fees for low income housing and road improvements, why can't they pay more to assure the creation of neighborhood parks? The CCW Ordinance should provide not only a formula for creating parks (accelerated Quimby Funds is not adequate), it should identify an implementing mechanism and phasing so that parks, housing and commercial space grow proportionately. Parks must be given better treatment.

The total 70.5 acreage figure given in the DEIR for parks and open space is totally misleading (p. 287). Private yards (41.32 acres) do not constitute open space or park. Neither are Public Schools (4.42 acres) or Private Commercial Open Space (7 acres) considered parks or recreational open space. Of the total figure given (70.5 acres) only 12.5 acres is proposed new park space, and 4.75 acres of that (Freeway Open Space) is unacceptable for parkland due to its proximity to the dangers, air pollution, and noise of heavy traffic. Thus, for an estimated increase of 18,000 residents, instead of the city's recommended 72 acres, the CCW Specific Plan is actually proposing to create only 7.75 acres of park. This is not properly addressed or mitigated in the DEIR.

Response: The Specific Plan will result in a total of 70.5 acres of parks and open space in the CCW area (DEIR, p. 287), according to designations and standards applicable in the City of Los Angeles. This will be created through developer designation and creation of open space within and around proposed land uses, through easement designation, and through fee simple purchase. Purchase and maintenance will utilize standard Quimby fees paid by developers, as well as accelerated Quimby fees as necessary. The latter may take the form of Community Facilities District revenues. Freeway parks comprise landscaped areas of pedestrian decks over freeways, which will comprise safe and pleasant open space areas, as has been implemented in Seattle, for instance.

Comment 51.e: The final major concern CCSEP has with the Specific Plan and the DEIR involves the proposed plans for Glendale Blvd. Currently, the traffic on Glendale Blvd. is

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a major disturbance to the community as it is very difficult to cross it. This community does not want or need more traffic on Glendale Blvd. To create more traffic on Glendale Blvd. would not fulfill the CCW Specific Plan goal to "preserve the neighborhoods" (p. 17 of the Specific Plan). In discussing the possibility of using a reversible lane to alleviate traffic on Glendale, there is not mention in either document of the median greenbelt. This community will not condone the removal of Glendale Blvd.'s median.

The CCW Specific Plan calls for reconfigured ramps from the Hollywood Freeway onto Glendale Blvd. The DEIR fails to recognize that any change would affect Echo Park (recommended mitigation B. p. 198). The DEIR does not properly address the taking of park land that the ramps would effect, and mitigation for that taking. Furthermore, such a taking would violate the Los Angeles City Charter which states that parks are to remain "forever for the use of the public inviolate" (Art. XVI, Sec. 170 b (3)).

This ramp reconfiguration also calls for the closing of Bellevue between Glendale Blvd. and Echo Park Ave., and the closing of the NB on ramp and SB off ramp on Echo Park Ave. The DEIR does not address how this will adversely affect both parking for the Echo Park Recreation Center and newly refurbished Children's Playground. Bellevue provides the only parking for the Recreation Center and playground. At any given time of the day an average of 15 to 20 cars park there. The DEIR also does not address how the ramp closures and reconfigurations will negatively impact the Echo Park community. When residents of this area exit or enter the Hollywood Freeway, they use Echo Park Ave. to avoid the crush of Glendale Blvd., especially during peak hours. Besides the unacceptability of taking park land, these ramp changes would have a crippling effect on both access to the park facilities and mobility within our community, yet there is no discussion of any of this in the DEIR.

Lastly, the drawing of the reconfigured ramps (Fig. 37 DEIR) shows new HOV/transitway Guideway on and off ramps north of the Hollywood Freeway. The DEIR has no analysis of how these could adversely affect the park activity immediately adjoining them. It would seem to us that increased heavy emissions from buses would not be conducive to a children's playground.

In summary, CCSEP finds many flaws in both the Specific Plan and the DEIR, especially relating to parks and Glendale Blvd; and there are many areas in the DEIR that are in direct violation of CEQA that cannot be overlooked.

Response: The Specific Plan does not recommend a reversible lane on Glendale Boulevard, however, this measure was discussed as an option during the plan development process; removal of the median strip is also not a plan recommendation. The Specific Plan provides for street and ramp modifications to reduce neighborhood traffic intrusion in the Echo Park area, and thereby concentrates traffic on Glendale Boulevard. One Specific Plan recommendation to effect neighborhood protection is the closure of Bellevue

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between Echo Park Avenue and Glendale Boulevard, converting the roadway right-of-way to park area (DEIR, p. 181). This creates open space and greatly increases contiguous park area; on-street parking from this segment of Bellevue could be replaced in an off-street lot using the new park land or adjacent space. Transitway on- and off-ramps for the Hollywood Freeway would not extend north of the freeway, but would service future HOV lanes in the freeway median; as these facilities would not extend north of the freeway, no playground impacts would be anticipated. In fact, any measures to increase vehicle occupancy are expected to reduce freeway impacts on adjacent uses.

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52. Commentor: Carl Shiigi

February 9, 1990

Comment 52.a: LAND USE. I am in favor of the 25 million square foot cap on industrial and commercial developments. Any major developments built must include mitigation measures to address the traffic impacts of additional peak hour trips.

Response: Comment acknowledged.

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53. Commentor: Juanita Tate, Vice President
Concerned Citizens of South Central Los Angeles

February 15, 1990

Comment 53.a: After reviewing the plans for the Central City West project, there are some concerns we would like to address: • There should be a first source hiring requirement for all categories of construction, improvements, or rehab programs with specific goals. • Anyone using city, state, or federal dollars should be required to participate in a first source hiring practice. • Businesses should be encouraged to hire a percentage of qualified personnel from the community, and could participate in job training/apprenticeship programs. • Businesses could use the Job Training Partnership Act program (JTPA) and the Employment Development Department (EDD) job pool to accomplish some of its first source hiring. In addition, the businesses will obtain tax credits for participating in the JTPA program. • The JTPA program could provide training to potential personnel. • Community Organizations could provide job screening. • Some traffic concerns could be mitigated by having personnel living within the area, who could either walk to work or obtain public transportation. Additionally, an employee bus could be provided. • Youth Training Programs There needs to be programs and/or

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job training targeted for youth in the community.

Response: Although overall regulation of hiring practices of CCW area construction and permanent employers is beyond the scope of the Plan and EIR, both support the commentor's recommendations. To the extent that area businesses utilizing local employment markets reduce their workers' commute trip length and facilitate use of public transit alternative modes, the plan's transportation demand management program will provide incentives for these hiring practices.

Comment 53.b: There are no provisions for a supermarket. As a suggestion, because of the multi-cultural community an international market seems appropriate. Examples being 32nd Street Market, or Grand Central Market.

Response: Agreed; although zoning entitlements and ground-level retail requirements provide for development of a supermarket, actual siting of a store will depend on developer response to market demand as local population grows through plan-induced housing production. Additionally, the land use functional elements of the Specific Plan for the Temple-Beaudry and Crown Hill Districts call for community-serving retail which would include a supermarket use.

Comment 53.c: There is no mention of a specific recycling program. There should be a workable recycling program implemented within the entire Central City West project.

Response: On the contrary, the DEIR recommends development of a recycling program as mitigation for the solid waste impacts of development (p. 316). This is proposed to be implemented through requirements of the draft Specific Plan Ordinance, and could be facilitated through the activities of the Local Development Corporation.

Comment 53.d: Linkage housing. Before a builder is allowed to pull a temporary certificate of occupancy on a commercial structure, replacement housing must be in place.

Response: Agreed; the Specific Plan, Ordinance, and DEIR (p. 128-129) each provide for such assurances.

Comment 53.e: Emergency evacuation procedures. There should be emergency evacuation procedures posted in english and spanish at all key points of construction sites.

Response: Agreed; the DEIR recommends emergency evacuation plans for area developments (p. 340).

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54. Commentor: Jose L. Magellon
J&J Trading Post

February 14, 1990

Comment 54.a: It's my fear that the build-out will effect my business and the community of Echo Park. I am totally opposed to the proposed elevated transit for Glendale Blvd., connecting with the 300 million dollar transit tunnel with 7th Street and Bixel Street. As a businessman of the community I back-up the suggested solution to commuter traffic problems which are as follows.

- Terminating the Glendale Freeway (2) at the Golden State Freeway (5) and creating a park-and-ride facility at this point.
- Restoring light rail service between downtown and this facility.
- Utilizing the abandoned rail yards in Atwater and north of Chinatown as a transportation corridor to route commuters around Echo Park and Elysian Park.
- Improving community access to and use of businesses and services located on Glendale Blvd. by restricting commuter and Dodger Stadium traffic on this important community thoroughfare.
- Encourage the redevelopment of Glendale Blvd. as a community retail center.

Response: See responses to Comments 50.k-50.m.

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55. Commentor: Mary Brooks, Citizen

February 11, 1990

Comment 55.a: I would like to voice my concerns about the plans for the Central City West (CCW) development. Firstly, I feel strongly that sufficient open space in the form of public parks is a vital factor for those living in city centers. The designers of CCW claim to visualize "a quality of life which heretofore has been lacking in the downtown Los Angeles ares." (CCW Specific Plan p.16) I am concerned that the mechanism for choosing the most suitable park sites, acquiring them, and constructing the parks is not part of the plan. Nor has the formula developed by Los Angeles City Recreation and Parks Department determining the amount of open space needed by the proposed increase in population in this area been adhered to. Page 281 of the Draft Environmental Impact Report (DEIR) states this as being 10 acres of land per 1,000 persons for total recreational facilities. A minimum of 10% of total land area should be in public recreation or open space. Neighborhood parks should provide 2 acres per 1,000 residents and community parks a further 2 acres per 1,000 residents. The plan, however, has set park acreage goals at only 1 acre per 1,000 residents for neighborhood and community parks. (DEIR p.283)

Response: The 70.5 acres of open space proposed under the Specific Plan (DEIR p. 287) provides for 15% of total land area (465 gross acres) in

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public recreation or open space, to satisfy the City Parks and Recreation Element objective of 4 acres per 1,000 population.

Comment 55.b: I would also like to mention that in my view, Freeway Open Spaces for active or passive use are definitely not suitable as public recreation areas because of their inherent sound, visual and air pollution. The parks and open spaces needed by the new community of CCW should be implemented by a specific agency within a specific time frame. But the CCW Specific Plan states that, "No specific timing can be identified for development of Parks and Open Spaces." (p.176)

Response: The Plan proposes creation of 4.75 acres of Freeway Open Space through development of landscaped pedestrian decks on the Harbor Freeway; these have been successful urban design and open space features in other cities (Seattle, for example), and do not result in safety, air quality or noise concerns. The plan identifies by district and neighborhood the open space and recreation needs in terms of type and size requirements for park uses, but cannot identify timing regarding the availability of specific parcels for development. However, the Local Development Corporation will be required to ensure that, as developments are proposed, each district/neighborhood's open space requirements are provided for.

Comment 55.c: One of the CCW Specific Plan's goals is to "Preserve the neighborhoods". (p.17) The Echo Park neighborhood cannot be preserved if Glendale Boulevard is built up into an even more major commuter route. Raised roads, freeway ramps, extra traffic lanes and the like would make this road even more of a blockade around the community than it already is, and further paralyse the access routes within the community. By expanding Glendale Boulevard, Echo Park park becomes threatened at a time when open space and recreational areas are in all too short supply.

Response: The Specific Plan provides for street and ramp modifications to reduce neighborhood traffic intrusion in the Echo Park area, and thereby concentrates traffic on Glendale Boulevard. One Specific Plan recommendation to effect neighborhood protection is the closure of Bellevue between Echo Park Avenue and Glendale Boulevard, converting the roadway right-of-way to park area (DEIR, p. 181). This creates open space and greatly increases contiguous park area.

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56. Commentor: Luba Perlin
Inner City Alliance/Bellevue Demo Club, C.D.C.

February 1990

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Comment 56.a: Problem: Getting the 'one person' out of individual autos to Downtown, and then to use valuable land for unnecessary parking. The terrible clogging of Glendale Boulevard as well as swelling traffic on the Golden State Freeway.

Answer: This is an interim and least expensive answer. 1. build parking structures (which can be used in the future for rail oriented transportation, as in other cities worldwide) where the problem starts. Then utilizing a fleet of the new much cleaner fuel-wise and therefore exhaustwise busses waiting at the parking structures. Emulate the European and Japanese electric busses. Each bus would eliminate 65 to 70 or more one driver operated autos to the downtown area. 2. Cut a continuation of the Eastern end of the Golden State Freeway directly into downtown streets through the East end of unused R.R. yards. The streets involved could be Broadway, Alameda or whichever streets that could be practical.

Result: 1. Diverting thousands of noxious autos off the Golden State Frwy. 2. Eliminating the one driver per car crush on Glendale Boulevard also through Elysian Park twice daily. 3. Eliminating the extremely expensive parking needs of thousands of autos in the downtown area also freeing much needed space for whatever - hopefully an emphysema facility on Stadium Way in Elysian Park twice a day. I am sure there are refinements to these 2 submitted alternatives to the major disruption and displacement of whole established neighborhoods and lacing our modest home grangs with what the developers' bull in the china closet answers are today.

This doesn't even mention the disruption, including displacing homes and whole neighborhoods. This is not the solution for more and more one person operated cars, more and more 60 to 70 started unneeded (30% vacancy now in skyscrapers built in D.T. areas) buildings on the edge of our community. All needing more scarce water etc. etc. at nauseam. Downtown Los Angeles can get away from noxious fumes and gridlock. Our neighborhood including beautiful Echo Park and Elysian Park and the hill area can remain to be used by the residents and generally, the needed clean air to be enjoyed. This is a rough draft, tackles the principle of neighborhood preservation and offers practical solutions relatively quickly and cheaply effected.

Response: The Specific Plan's program of HOV access routes from the north and south and mass transit connections to the east and west is compatible with development of peripheral parking structures and shuttle services, however, mandating and siting the out-of-area parking facilities was considered infeasible during the plan development process, since it could result in the transfer of the downtown access problem to the outlying areas where the parking structures are sited. Nevertheless, Caltrans and the Community Redevelopment Agency have looked at - and continue to study - the opportunity for peripheral parking and feeder shuttle service for the greater CBD. Such programs would be compatible with the Specific Plan should they be implemented.

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57. Commentor: Emma Steiney, Citizen

(no date)

Comment 57.a: A freeway should not be counted as an "open" space.

Response: The Plan proposes creation of 4.75 acres of Freeway Open Space through development of landscaped pedestrian decks on the Harbor Freeway; these have comprised successful urban design elements and open space features in other cities (Seattle, for example), and do not result in safety, air quality or noise concerns.

Comment 57.b: The plan should lower the jobs/housing ratio to 1-1; if the mission of the "plan" is to have a proximity of housing to employment, then there must be a jobs/housing ratio 1-1. If there is to be a jobs/housing ratio 1.1 then there must be other funding mechanism beside the ones listed in the plan. We propose the profits of the developers and companies that operate in the "plan" area be taxed. Such tax money must be allocated for housing.

Response: On the contrary, the Southern California Association of Governments (SCAG) has set job-housing balance objectives based on the goal of achieving a 1:1 balance of workers-by-place-of-residence to employees-by-place-of-work, and since there are on average greater than one worker per housing unit, the regional average job-to-housing ratio of about 1.25:1 is necessary for a job-worker balance ratio of 1:1. The Specific Plan has been developed to promote achievement of job-housing balance as defined by SCAG. See response to Comments 15.a-15.g.

Comment 57.c: The Echo Park tennis courts remain at the present location.

Response: Agreed; the Specific Plan recommends the maintenance and upgrading of the existing Echo Park Tennis Courts (DEIR, p. 33).

Comment 57.d: If the "plan" is to be truly a collaborative effort of the private, public and community sectors, then we propose the City Administration unit stay as it is but that the Community Development and Housing Corporations become one corporation. This new corporation would be composed of members from the Community along with private outside members (developers and related interest groups). But community would a majority in the Corporation.

Response: The plan has proposed separation of the Local Development

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Corporation, which would implement the Community Facilities District, from the Housing Development Corporation, as required by law, to ensure that housing production funds are channelled specifically to the objective of producing and replacing both market-rate and affordable housing.

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58. Commentor: Bryan Allen, Citizen

no date

Comment 58.a: I hereby submit the accompanying clippings from a local newspaper as multiple, discrete, environmentally significant comments upon the subject DEIR and other documents, with the object of eliciting multiple, discrete and carefully reasoned responses to each. To that end, I hereby incorporate them herein by reference as if they were individual comments written personally by me.

What does 14 Cal. Ad. Code Sect. 15088(b) provide? How explained in depth, will the lead agency and its consultants ensure its plenary and robust implementation for the subject DEIR? How can the public, responsible agencies and city organs know reliably, not merely accepting glib assurances on faith of intent or "policy", that such will be done?

Response: The cited section of the state CEQA Guidelines provides for a good faith reasoned response to public comments received regarding the Draft EIR. The City, in preparing the responses to comments contained in this document, has attempted to collect and present additional data regarding the Specific Plan and its effects where required, and has attempted to describe the disposition of significant environmental issues raised by commentors, and, where appropriate, to identify additional mitigation measures to address anticipated impacts or objections.

Comment 58.b: What does the second sentence of 14 Cal. Ad. Code Sect. 15204(a) provide? What does 14 Cal. Ad. Code Sect. 15204(e) provide? Will the lead agency fully implement these provisions fully and robustly in their spirit and letter, or will the lead agency and its consultants find ways conveniently to circumvent them while appearing "dutifully" to meet the requirements of CEQA?

In particular, will the lead agency and its consultants seek to find justifications for avoiding the examination of "additional specific alternatives" in a supplemental DEIR as suggested in public comments while offering superficially plausible but specious justifications for avoiding such examination? How can the public, responsible agencies and city organs know reliably that you resolved a conflict of interest on the side of environmental protection and the comprehensive public interest rather than on the side of pursuing a quick conclusion in this case and the avoidance of additional, difficult work?

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Can the lead agency and its consultants ensure that the FEIR meets all requirements of CEQA, legally and intellectually, without allowing for a margin of human error and inadequacy? Specifically, can you ensure a robust FEIR unless you strive to surpass the barest requirements of CEQA?

What criteria do the lead agency and its consultants apply to determine what sentences, paragraphs and/or comments constitute significant comments upon environmental issues, especially where commentary is not neatly divided into discrete comments and notwithstanding whether CEQA requires the application of such explicit criteria?

Response: The cited sections of the state CEQA Guidelines provide direction to commentors who may be reviewing the Draft EIR, and recommends that comments are most helpful when they focus on suggesting additional specific alternatives or mitigation measures, but also note that the CEQA Guidelines section should not be construed as a basis for restricting reviewers from commenting on broader environmental issues and general DEIR adequacy. To this end, the City has excerpted all comments directed at the content or adequacy of the DEIR, and comments regarding the Specific Plan which address significant environmental issues, mitigation or alternatives.

Comment 58.c: This EIR, as with EIRs generally, is faulty for presuming, as a fundamental implied premise, that the demand for infrastructure and related public services is instead a basic and nearly unavoidable "need". The EIR tacitly implies--and most growth NIMBYists believe--that such "needs" arise directly and nearly invincibly from inanimate development and real estate by nearly fixed ratios of correlation. The EIR fails to recognize and, by implication, rejects that the demand for all infrastructure and public services arises from an aggregation of individual, free, moral choices by people to the exclusion of causality by development per se. An EIR may validly predict statistically in the aggregate what people will choose to do but only within certain confidence ranges dependent upon the precision and specificity of the description of circumstances and their comparability to those previously studied.

Accordingly, the subject EIR fails to disclose that its predictions of impacts resulting from later human behavior (as opposed to the development's direct, physical impacts) are simply statements of estimated probabilities and that the actual outcomes could be altered by circumstances changing or by a different set of subsequent human choices. Most pertinently, the EIR is consequently abjectly BLIND to methods of mitigating predicted impacts upon and by infrastructure and related public services by economically regulating and dampening demand for such. Specifically, this means imparting individually controllable financial responsibility for the costs of infrastructure and related services to the individuals who demand (try) to use them, particularly when demand exceeds supply or capacity. This also includes financial responsibility for the costs of mitigating the adverse effects imposed by users upon third parties and/or the natural environment. This, in turn,

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means eschewing tax and developer subsidies for provision or use of infrastructure and related services and marginal-cost PRICING thereof. Individual responsibility and self-policing in budgeting, at the real source of consumers' demands, is without peer in its effectiveness in combined curtailment of wasteful, inefficient or harmful demands and expansion of resources to cope with demands consumers find essential, as shown by their willingness to pay. (Coping with demands, again, includes environmental mitigation.)

The error noted [above] permeates the EIR's discussion of mitigations for impacts related to transportation and circulation (including, not excluding, the mention of a development-linked "traffic demand management program"), parking, energy conservation, water utilities, sanitary sewers, solid-waste production and disposal and, to a degree, fire-protection services. A related error plagues the discussion of mitigations for air-quality and surface water-runoff impacts. (Air pollution is neither infrastructure nor a public service, but pricing incremental emissions would generate funds to help compensate those suffering health or property damage and dampen use of polluting vehicles. The demand for flood-control services arises immediately from the characteristics of property, but levying controllable, marginal charges for incremental runoff due to grading and construction of impermeable surfaces would lead to the developer minimizing those characteristics.)

Response: The DEIR has attempted to provide both estimates of aggregate demand for services and infrastructure, as well as information regarding the tolerance levels of these aggregate forecasts due to individual behavior and decisions. For example, the transportation demand management program is formulated to achieve reduction of single-occupant commuters from current levels of 75% in CCW to 45% under the Specific Plan, however, an analysis of a less-successful scenario and the attendant transportation improvement and potential mitigation needs is also presented (DEIR, p. 175). With regard to the second major plan issue of housing, the alternatives analysis discusses the market demand and potential for increased housing demand compared to the proposed Specific Plan (DEIR, pp. 402-407).

Comment 58.d: It is important for mitigative effectiveness (and economic efficiency) to charge even capital costs for infrastructure marginally to its users wherever feasible and to account for the effect of this upon demand in planning the infrastructure's size. (Exempli gratia, the capital costs of water mains and sewers should be recovered from building owners or occupants or lessees as marginal utility charges, unless revenues became insufficient to amortize the cost, in which case, fixed utility charges would be substituted. Hiding the costs in development prices should be avoided in either case.) Especially where alternative, more desirable uses may be made of a property or facility, e.g., paved, impermeable parking space versus a building and/or green space, capital costs should be charged marginally to users to give them maximal decision-making control, including over the environmental consequences of their actions, and guide investors to make the most sound environmental as well as economic decisions in meeting consumer demands.

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Response: Agreed; the proposed Specific Plan facilitates such user fee applications. For instance, a primary approach towards fulfilling developers' and tenants' responsibilities for transportation demand management throughout the region has been parking management, which includes charging for parking and setting parking fee scales which provide incentives for ridesharing; the Specific Plan's limitations on parking supply will promote this approach. However, other costs cannot be feasibly passed on to users as a basis for influencing behavior; for example, since open space and recreational resources are intended to be available free of charge as public goods, attaching user fees which feed back to developers' decisions regarding permeable softscape versus hardscape areas, as suggested by the commentor, is not practical.

Comment 58.e: To offer "Comment noted" to this comment would be unresponsive. To reply that "standard" methodology, methods, calculations and data were employed would be similarly unresponsive. (Obviously, standards can be wrong or inadequate, and everyone would strive to surpass standards where feasible.) A reasoned response should be given (cf. 14 Cal. Ad. Code §15088(b)) independent of and unbiased by previous actions. If you were to reject my comment, then your response should be "zero based" or state, in essence, why you would proceed to act the same or similarly today for the first time, as if no EIR or environmental guidelines had ever before been prepared.

Response: Agreed; the City has formulated a plan which surpasses existing standards and which set new standards and expectations for transportation programs, housing production, urban design and environmental protection. For example, the transportation program addresses existing and future cumulative regional facility needs (DEIR, p. 197) and sets new equity standards for determining significance of traffic impacts (p. 201); the service systems/utilities programs calls for solid waste and grey water recycling (pp. 316, 311); the recreation and parks program introduces the potential for development of freeway deck pedestrian ways and parks (pp. 33-34); and the historic resources program proposes new historic structure and cluster designations (pp. 363-364).

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59. **Commentor:** Maria Elena Durazo, President Local 11
Hotel & Restaurant Employees Union, AFL-CIO

February 22, 1990

Comment 59.a: The EIR devotes considerable attention to the laudable goal of encouraging and enabling people in Los Angeles to live near where they work. The main measure by which the EIR gauges the achievement of this goal is the maintenance of the

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existing jobs-housing balance, i.e. the mix of employment and housing opportunities, in Central City West as growth proceeds in the Plan Area. The intent of the Plan is to at least maintain the current ratio of housing opportunities to jobs by decreasing the amount of space zoned commercial and increased amount of space zoned residential from that allowed under the existing community plans, as well as by providing that a significant amount of affordable housing be built in Central City West.

The Plan should encompass specific programs to make the goal of employing local residents a reality. These programs should perform two main functions: 1) getting employers in the area to hire local residents; and 2) training local residents so that they are qualified to take advantage of new employment opportunities in the area. Programs which have been tested in other cities and should be implemented in Central City West include the following:

First Source. The Specific Plan, the Ordinance, and development agreements executed by the city and individual Plan Area developers, should require that employers in Central City West agree to a monitored goal of hiring not less than 20% of their employees from inside the Plan Area, and not less than 35% of their employees from within a four-mile radius of the Plan Area. Developers, their construction firms, and the managers and tenants of new commercial buildings should be required to execute "First Source" agreements, stating that local residents--especially those referred and trained by community-based job-training and placement agencies--will be the first and preferred source of employees for their operations. These parties should also be required to provide the Planning Department and the Community Development Corporation with annual reports on the number of their employees who live in and near the Plan Area.

Initial agreements for each project should be negotiated between the developer and the city. The developer should then require the construction firms, tenants, and management firms with which it does business to enter into similar agreements. Recruitment, screening, and referral of employees for the First Source Program should be done by non-profit community-based organizations and unions. The Community Development Corporation would serve as a coordinating agency in implementing these First Source agreements. Developers of projects which must go through Tier Two (Expanded) Site Plan Review (i.e. those in mixed-use zones, those which request density transfers/bonuses, those which sign development agreements, etc.) would be required to sign such agreements; those which only require Tier One (Basic) Site Plan Review would be encouraged (but not required) to do so. Developers and community groups have worked together to make such First Source programs a success in major cities such as Boston and Chicago.

Job Training. The Specific Plan and Ordinance should also specify that major commercial development projects in Central City West provide funding for job training for residents of the Plan Area and communities immediately surrounding it. The proposed Commercial Development Linkage Fee should be increased by \$1.00 per square foot of commercial and industrial space to support such efforts. Funds generated through this fee should go to

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fund a program which trains Central City West and nearby residents for entry level positions in companies to be located in the Plan Area, as well as to fund the implementation of the First Source program. Primary responsibility for implementing the job training program should rest with the Community Development Corporation, although community-based organizations and labor unions should be contracted with to conduct the actual training. (As it stands, the Specific Plan's brief reference [on p. 189, "Development Agreements"] encouraging the inclusion in development agreements of language requiring job training and employment recruitment for local residents is insufficient to meet the need for job training which will confront the Central City West community as development proceeds.)

In addition to enabling the city to improve the jobs-housing balance, these programs will guarantee that development in Central City West benefits all the area's residents, not simply those who were lucky enough to own property at the time the plan was written and implemented.

Response: Although overall regulation of hiring practices of CCW area construction and permanent employers is beyond the scope of the Plan and EIR, both support the commentor's recommendations. To the extent that area businesses utilizing local employment markets reduce their workers' commute trip length and facilitate use of public transit alternative modes, the plan's transportation demand management program will provide incentives for these hiring practices. Nevertheless, first-source and job-training programs should be pursued through the Local Development Corporation which would oversee programs established through Developer Agreements binding new CCW businesses.

Comment 59.b: Insufficient Discussion of Environmental Impacts from Creation of Low-Wage, No-Benefit Jobs, and Inadequate Measures to Mitigate Such Impacts. Implicit in the EIR is a recognition that increased employment allowed under the proposed Plan will, along with its benefits, generate negative environmental impacts which demand mitigation. The added jobs will place extra strains upon our already crowded highways, dwindling affordable housing stock, and polluted air and water as new workers flock to Southern California to fill these jobs. The EIR contains careful, quantitative analysis of some of the impacts which result from this job growth. Moreover, the extensive Transportation Demand Management Plan and the Affordable Housing Program and other elements encompass concrete steps to mitigate some of these impacts. However, the EIR and the Plan fail to mention several critical negative impacts of this job growth upon the environment. Because of this, they are also deficient in their proposed mitigation measures.

As mentioned above, under the Specific Plan, approximately 78,770 people will work in Central City West by the Year 2010, with 52,270 of them in new jobs. If current

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employment distributions for Downtown Los Angeles are mirrored in the new Central City West economy, approximately 25% of those employed in the area, or 19,700, will earn less than \$25,000 per year of household income in 1985 dollars. New jobs will be created, but thousands of those holding the jobs will be under-employed, i.e. engaged in low-wage or part-time work which fails to provide for their basic needs for food, shelter, medical care, and clothing.

At these wage rates, many of the workers in Central City West will not be able to afford market rate housing, even with the substantial commitment to affordable housing made under the Specific Plan. For example, a Los Angeles resident must now earn an annual household income of \$20,000 to afford the median priced rental unit of \$500 per month paying no more than 30% of this income for rent. Moreover, if their employers do not provide them with basic health insurance, these workers will not be able to pay for it themselves. It is estimated that a family of four with an income of less than \$33,000 per year cannot afford to purchase private health insurance if such insurance is not provided as a benefit of employment. For example, in California, 45% of all workers whose family incomes are between \$11,203 and \$16,692 are medically uninsured.

The direct result of this low-wage, no-benefits job creation will be a series of environmental impacts which must be mitigated. Working people who do not earn enough to afford decent housing will live in sub-standard or overcrowded dwellings, cut back on other essentials, or, in times of crisis, be forced into the street and become homeless. In all these instances, they will place strains upon the existing city and county social service systems through requests for housing and food subsidies, shelter, and housing code enforcement, among other things. Those without employer-provided health care will turn to the already over-taxed county health system and private emergency rooms for care, exacerbating the existing crisis. These strains will be the direct result of the new job growth, and the California Environmental Quality Act ("CEQA") requires that the EIR discuss these impacts in detail and spell out how they will be mitigated.

A range of mitigation measures are available to address these impacts, and these should be incorporated into the Plan, the Ordinance and the EIR. The primary goal of these mitigation measures should be to make sure that new employers who create new jobs in Central City West pay their employees decent wages and health benefits, or take steps to ensure that government and non-profit agencies won't have to provide extra social services which act as an indirect subsidy of the new job growth. These steps would include the following:

Include in Plan goals the creation of jobs with decent wages. To start, the general goal of guaranteeing decent employment opportunities for Central City West and Los Angeles residents should be included among the goals of the Plan itself. Language should be inserted which states that a goal of the Plan is "to expand employment opportunities at decent wage and benefit levels for jobless, underemployed, and low-income persons." This goal should then serve as the basis for the policies outlined below.

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Require minimum wage levels and employer-provided health insurance. In order to eliminate the need for additional housing subsidy and strains on the county health care system, developers, contractors, commercial and industrial tenants, and management firms in Central City West should be required to " a) provide a minimum level of health insurance to their full-time, year round employees who earn less than a level of approximately \$33,000/year; and b) provide all employees with wages at a level where additional subsidy will not be needed for the employees to obtain affordable housing, i.e. where housing costs make up not more than 30% of the employees' household income. This provision would be enforced by requiring developers to include covenants in leases, construction agreements, and management agreements with their tenants, contractors, and management firms specifying the minimum wage and benefit level requirements. The EIR should be modified to include an analysis of the exact wage levels which would be required in both instances.

Response: The vision statement upon which the plan is based includes such an element "Maximize residential development potential, in balance with commercial development, at all economic levels" (DEIR, p. 25). The goals for implementation of the Specific Plan include "Provide job training and placement program for local residents" (DEIR, p. 29). The goal of controlling the wage levels and benefits offered for jobs has not been included in the proposed Specific Plan due to the lack of mechanisms for implementing such controls.

Comment 59.c: Encourage an atmosphere conducive to collective bargaining. History has shown that new workers in developing areas such as Central City West will be much more likely to obtain levels of wages and benefits which enable them to afford housing and prevent them from becoming a strain upon the social service system if they are organized and engage in collective bargaining over wage and benefit levels. In order to protect the opportunity of future workers in Central City West to engage in collective bargaining over wages and benefits, the Ordinance should include a requirement that developers, construction firms, tenants, and management firms, as employers in Central City West, must agree to be neutral with respect to the organizing of employees into labor unions. To evidence their neutrality, these parties should also be required to recognize collective bargaining agents pursuant to a standard form of neutrality and recognition agreement (similar to the one attached to this letter.) The Site Plan Review Board and the Community Development Corporation board of directors would review whether these parties have complied with this requirement.

Include First Source and Job Training. The First Source and Job Training components described above, in addition to aiding the jobs-housing balance, will also help to mitigate the impacts of the new job creation, by making it more likely that Plan Area residents will be the partial beneficiaries of the new employment growth, rather than under-employed bystanders watching the development process.

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Response: Agreed; the Local Development Corporation should be responsible for coordinating opportunities for participation of collective bargaining units as parties in plan implementation, and for promoting first-source and job-training programs, pursuant to adopted City procedures (DEIR, pp. 43-44).

Comment 59.d: Housing Element Falls Short in Providing Affordable Housing Which Meets the Needs of Area Residents. The paragraphs above refer to some of the deficiencies in the affordable housing component of the Specific Plan and the Ordinance. But there are additional shortcomings to this component as currently written which should be changed before the Plan and Ordinance are approved in order to give real meaning to the stated (and laudable) commitment to affordable housing and replacement housing for residents contained in these documents.

Specify Maximum Allowable Rent for Affordable Units. The Ordinance and Plan specify the income levels required for residents to be eligible for low and very-low income housing units which will be built in the Plan Area. However, they do not specify rent levels which would ensure that the units are in reality affordable to such families. The Plan should specify maximum allowable rents for designated low and very-low income dwellings, pegged at: a) 25% of 80% of the median income as adjusted for family size for low income households; and b) 25% of 50% of the median income as adjusted for family size for low income households.

Response: See response to Comment 50.g.

Comment 59.e: Include Phasing Mechanism to Guarantee Provision of All Affordable Housing Units as Plan Proceeds. The Ordinance requires that 1,000 of the 5,300 affordable housing units to be built under the Plan be completed by the time several of the major commercial projects are ready for occupancy. However, there is no requirement that the construction of the other 4,300 affordable units be timed to coincide with stages of commercial development. This leaves open the possibility that job opportunities and housing needs will be generated by new commercial development, but new affordable housing will not yet be built to meet the increased housing needs.

This situation can be corrected by including in the Plan a phasing mechanism whereby a certain number of affordable housing units must be built before commercial development can proceed to the next phase (i.e. before new commercial development building permits can be issued.) These phases can be the same ones used for monitoring the pace of transportation improvements as they relate to commercial development. At a minimum, one quarter of the affordable housing should be built during each of the four phases.

Response: The Specific Plan, Ordinance and DEIR (p. 129) ensure that housing units be available for occupancy commensurate with issuance of a

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Certificate of Occupancy for the commercial space which was obligated with development of the required housing.

Comment 59.f: Specify Size of Affordable Housing Units Required, with Majority to be 2-3 Bedroom Units. Our union's members and their families - hundreds of whom live in Central City West - have an average of 3.61 people per household and live in overcrowded apartments, with 2.46 people per bedroom. The affordable housing to be built in Central City West will only serve their interests - and the interests of thousands of other low-wage workers - if it contains enough bedrooms to house them and their families safely and comfortably.

The Ordinance implicitly recognizes this problem when it specifies that affordable housing units must be "consistent with the needs of the population of the Specific Plan area, predicated upon demographic information." But to have teeth and to meet the community's needs, it must contain the more specific requirement that a certain number of the units be 2-3 bedroom. We propose a minimum of 50% of the units as 2-3 bedroom units, with a minimum of 20% 3-bedroom units.

Response: Agreed; the Specific Plan specifies that affordable residential units be provided in unit mixes and sizes consistent with the needs of those requiring low and very-low housing units (DEIR, p. 128).

Comment 59.g: Very Low Income Units Demolished Should Be Replaced by Very Low Income Units. Section 14 A 2 of the Ordinance allows developers of multiple-unit residential projects to replace very low income units demolished since February 14, 1988 with low income units. This is unacceptable. They should be replaced by very low income units. The section should read as follows: "Document and replace . . . low and very-low income dwelling units demolished on the site, effective February 14, 1988, with very-low and low income units, in the proportion in which those units existed in the building before demolition."

Response: Agreed; this section of the Ordinance has been modified.

Comment 59.h: Ordinance Should Provide for Announcement of Affordable Units' Availability to Displaced Residents in Newspapers, Through Radio Public Service Announcements, and to Local Organizations. If previously displaced residents of Central City West are to be able to take advantage of their priority right to affordable housing in the area, there must be a provision in the Ordinance which makes it likely that they will find out that the housing units are available. The Ordinance should require that notice of the housing availability, (including eligibility requirements, rental rates, unit size and location, and application site) be given quarterly in English and Spanish in local newspapers. The same information should be provided in public service announcements on English and Spanish radio stations at least quarterly. Information about the availability of affordable housing units should also be distributed to community organizations and unions

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whose may have former Central City West residents among their membership.

Response: The Housing Development Corporation will administer this program, providing adequate notice and maintaining waiting lists (DEIR pp. 44-45).

Comment 59.i: Alter Zoning and Density Allowance to Eliminate Discrimination Against Smaller Property Owners. The Specific Plan and Ordinance lay out a future for Central City West as a carefully planned, mixed commercial and residential community. On their surface, the zoning and land use maps which will guide this development appear to present a rational plan for placing certain types of uses in certain places. However, upon closer examination, these maps reflect a logic which is more political than anything else, one by which a handful of very large and influential property owners with plans for huge commercial developments are set to obtain the lion's share of special zoning rights and increased density. At the same time, the area's smaller, less powerful property owners are to be affected most by reductions in density and land use rights.

This is unfair to smaller property owners such as our union. We feel that development rights within the areas zoned C-2 under the Ordinance should be distributed more evenly. Under the proposed Plan, all property on the east side of Bixel Street between Third and Sixth, and on the corner of Third and Bixel, will be zoned C-2-2 with a maximum allowed Floor Area Ratio (FAR) of 6:1. By contrast, our property, directly across from and adjacent to properties with the 6:1 FAR will be zoned C-2-D, with a maximum allowed FAR of only 4.5:1. There is no good, rational explanation for this variation in zoning rights.

The results of this variation will be problematic. On the west side of block of Bixel between Third and Fourth, the arrangement will render difficult the coordinated development of the two sites as one parcel. Moreover, the difference in allowed densities on each side of the street will likely cause imbalances in design of buildings on the retail corridor planned for Bixel Street. We feel strongly that the Plan and Ordinance should be amended so that either the allowed FAR of all properties on the West side of Bixel should be raised to 6:1, or so that the allowed FAR on both sides of the street should be reduced to 4.5:1. Similar inequities between small and large property owners in other parts of the Plan Area should also be corrected.

Response: The stepping-down of commercial entitlements from east to west is an element of the Specific Plan which is intended to provide compatibility with current density patterns and to reduce impacts on predominantly residential neighborhoods west of the plan area (DEIR, pages 90-91, 106).

Comment 59.j: Require That Not Less Than 1/3 of Child Care Provided by "Affordable." As discussed above, it is important that housing and health care be affordable to all people who will work in Central City West. Similarly, a sizeable percentage the child care which

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the Ordinance requires in major commercial projects should also be affordable to the low-income employees at these new projects, and to low and very-low income households which reside in the Plan area. A section should be added which requires that "not less than 1/3 of the child care facilities required under the Ordinance be made available to very low and low income households at rates set forth in the State Department of Educations' Childcare Fee Scale based on income and family size."

Response: Although the Specific Plan provides requirements for child care facility development for non-residential developments of 50,000 square feet or more, regulating the pricing of child care services is beyond the scope of the Specific Plan.

Comment 59.k: Community Development Corporation Board Should Include Community and Labor Representatives. The proposed composition of the board of directors of the Community Development Corporation is too narrow to represent the interests of all property owners, residents, and workers in the Plan Area. The board should be expanded to include two representatives of major community organizations and/or churches in the area and one representative of a labor union in the area.

Response: Although the composition of the Local Development Corporation board has not been determined, as property owners and employers in the project area, labor union representatives will be provided with opportunities for involvement in the LDC.

Comment 59.l: Ordinance and Plan Should be Submitted to Annual Review by Public Hearing. While the Central City West Specific Plan is an impressive document, it does not and cannot possibly predict the full range of developments which will impact that community. The Ordinance includes a requirement that reports on the progress of the Plan be submitted annually. However, the submission of reports will not provide the forum necessary to include all parties in evaluating the Plan's impacts and problems. Therefore, the Ordinance should require an annual review and public hearing on the Specific Plan to be held before the Planning and Land Use Management Committee of City Council.

Response: Agreed; such a program is proposed under the Mitigation Monitoring Program presented in Section IV of this document.

Comment 59.m: Conclusion. The Central City West Specific Plan, Ordinance, and EIR represent an impressive accomplishment. Public officials, private developers, and community leaders have come up with a plan which goes quite far in addressing some of the major inequities which have plagued much previous development in Los Angeles. But unfortunately, they do not go far enough in addressing the great and increasing inequities which threaten this city.

We ask that the suggestions which we have provided here be incorporated into the

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comments on the Specific Plan, the Ordinance, and the EIR, and ultimately into the final documents which will provide the framework for development in this area. If they are included, the Central City West Specific Plan will serve as a model for how responsible and balanced growth can proceed in Los Angeles in the future.

Response: Comment acknowledged.

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60. **Commentor:** Lee Strieb, Research Analyst Local 11
Hotel & Restaurant Employees Union, AFL-CIO

February 23, 1990

[Comments submitted in this letter addressed the Specific Plan and not the adequacy or content of the EIR, and will be responded to by the Department of City Planning through the staff report and/or revised draft Ordinance.]

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61. **Commentor:** Jim Zellers, President Local 399
Hospital & Service Employees Union AFL-CIO

February 22, 1990

Comment 61.a: The Hospital and Service Employees Union Local 399 represents approximately 8,000 building service or janitorial workers in commercial office space. Many of our members work and live in the downtown area. The Union is also a property owner in Central City West (CCW). Local 399 believes that any new development in CCW should be undertaken in way which improves the quality of life for janitors and other low-income workers.

Our principal concern is related to the current crisis of the public health care system in Los Angeles. The DEIR overlooks the increased financial strain that will be put on Los Angeles County's budget for indigent health care because many of the new service sector jobs created in Central City West will most likely not offer health insurance. If current trends prevail, current industry-wide standards tell us that insurance will not be provided, and the taxpayers' bill will escalate.

Private-sector employers are contributing to the growing health care crisis by steadily reducing their share of the burden on health care costs. When they fail to provide health insurance coverage, the County is forced to pick up the costs. Those employers receive a direct subsidy from the Los Angeles County taxpayers, who every year pay millions of dollars in health care for the indigent.

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The commercial real estate community has played a role in causing the health care crisis. Many building owners have switched from cleaning contractors that provide health insurance to cut rate operations that provide no benefits. This has led to the virtual elimination of health insurance for janitors across the County as has swelled the numbers of the medically indigent. The Justice for Janitors Campaign, which began three years ago, is aimed at reversing this trend of non-union (low pay and no benefit) janitorial jobs.

We believe health insurance should be made a central issue of the new Specific Plan for Central City West. Such a large-scale development project must take into account the needs of the community, as has been the case with housing and childcare. In an area where 58 percent of the community's households earn less than \$10,000 per year, it is clear that most families cannot buy health insurance, and do not have insurance through their jobs.

From the projected build-out of 17.3 million square feet of commercial office space in Central City West, Local 399 estimates that 550 janitorial jobs will be created. Additional service jobs will be created in the hotel and retail industries. Many of the jobs which will be created in these industries typically do not provide health insurance for employees or dependents. This is a significant number of workers that could potentially be without health insurance. The County health care system is already overburdened. Additional strain on this system would be an invitation to catastrophe.

A development plan that stands to benefit Central City West by public and private investments in the area should not pass on health care costs to the County. The health care crisis is one of the most serious facing Los Angeles today. Local 399 believes that before the Specific Plan and the DEIR are approved, this issue of public subsidies to private developers must be resolved. We look forward to working with the City and the Los Angeles community on possible solutions to this problem.

Response: Controls on the minimum wage levels and benefit packages, including health care benefits, are beyond the scope of the Specific Plan. However, community and labor union participation in the Local Development Corporation may help develop incentives for such improvements.

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CITY PUBLIC HEARINGS

62. **Commentors:** Individuals Testifying at
Public Hearing Regarding the Specific Plan and DEIR

February 8, 1990

John Warfel, 443 West Rustic Road, Los Angeles.

Comment 62.a: I have come here today to express my support for the Central City West Specific Plan and I also want to commend the Planning Department on the way the process has been handled so far. I'd like to comment on the low income housing inclusionary and replacement housing programs. I support them except for one serious reservation. Under the current formula for replacement housing, a total of 2,000 low and very low income units are required to be built. 1,000 of these units will be built within the Plan area. The way the Plan is now written, it is possible and in fact, highly probable that most of the low income replacement housing will be concentrated in one area of City West. The housing will be built where the land is cheapest. Namely, Temple Beaudry Hill. In fact, there is currently a proposal to build a 120 unit low income housing project there now and I have heard of plans to build a 53 unit low income housing project right next to it. The Temple Beaudry Hill is currently zoned for approximately 2,100 units in the R-3 areas where the cost per unit for land is below us. The Plan projects that 50% to 75% of this housing will actually be built or somewhere between 1,050 and 1,575 units. Temple Beaudry also contains a significant amount of existing low income housing of the existing low income housing in City West. When you combine the existing low income housing with low income housing required by inclusionary zoning and add to this the probability that an additional 500 to 1,000 units of low income housing will be built there under the replacement housing program requirement, it is highly likely that well over 70% of the housing on Temple Beaudry Hill will be low income projects. This housing will also be built first, further discouraging market rate projects to follow. If large concentrations of low income housing projects are encouraged by a combination of the Specific Plan and local economic forces, the City will be building, albeit with private funding, more of the type of large housing projects that have proven a failure time and again in Los Angeles and in other cities. I have attended all the meetings held by the Planning Department and many of the meetings of private citizens concerning the City West Plan. Over and over, I've heard people say "no large housing projects." New and low income should be mixed with moderate middle and high income housing. While the goal of the Plan is stated to have a housing mix, there is no mechanism for insuring that low income housing will be built throughout the residential zones of the Plan rather than in one neighborhood. The Specific Plan now calls for a minimum number of low and very low income units. I believe that the Plan must also call for a maximum number of units allowed per area. This could be accomplished by requiring replacement housing to be built in the area from where it was initially removed and that a cap be established on the number of low income units allowed per block within each zone. This would assure preservation of existing neighborhoods and would discourage the creation of large blocks of low income housing projects. I request that the Planning Commission look into establishing a mechanism to

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include the low income families and neighborhoods within Central City West rather than segregating them into permanent low income parts of town. Thank you.

Response: It is the role of the Housing Development Corporation to ensure that the plan goals regarding housing, including the production and mix of affordable and market-rate housing within the plan area (DEIR, pages 44-45).

Lisa Snyder.

Comment 62.b: Good afternoon. I am speaking on behalf of the Los Angeles Conservancy. We have reviewed your preliminary plan for the Central City West Specific Plan ordinance and have several concerns relating to the treatment of the plan area's historic resources. We feel that these issues are not being adequately addressed. First, the transfer of density rights is the only mechanism identified as a preservation incentive. Other incentives should be explored and implementation measures should be outlined in the ordinance. Second, the transfer mechanisms and density bonuses should be extended to include all significant historic resources including those identified and eligible for the National Register, State and City Landmarks status. The Plan ordinance currently specifies only designated resources. The ordinance and plan encourage relocation which we cannot condone as a good preservation policy. In addition, only small clusters are identified as receiving sites for historic resources. Certainly not enough to accommodate the number of resources potentially threatened throughout the area. Fourthly, while housing is identified as a priority of the Plan, there is no discussion given to the rehabilitation of existing resources. We feel that this element should be addressed, and finally, table 1 listed in the ordinance is only a preliminary survey list of historic resources and does not contain any evaluation. This should be updated to reflect recent demolitions and should note the Specific Plan sub areas in proposed zones of each identified resource. We would also ask to see a complete background history prepared on the area. Thank you.

Response: On the contrary, the Specific Plan Ordinance identifies 82 structures for historic preservation: 6 designated resources, 11 resources worthy of designation, and 65 structures which are in historic clusters worthy of designation. Receiver zones have been sized to accommodate these potential resources.

Michael Woodward.

Comment 62.c: A series of cases beginning with Nolan... well beginning before that but including Nolan, the Russ Building Partnership case, Rhone vs. City of Visalia, the Seawald case and the recent Bixel Assoc. vs. the City of Los Angeles indicate that there must be a reasonable relationship between fees and burdens caused by a particular development. On page 31 of the Specific Plan, you have traffic fees that are based on square footage which is a difference from the original version of the Plan where they were based on trips. There is also a 10% non-refundable cash deposit that's indicated on that

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same page. In addition, there's a traffic fee of \$5,000.00 odd dollars for excess parking spaces and finally, as Dan indicated, some of the owners - the owners here are being required to provide regional improvements. All of these items, particularly the fees, are not really related to the specific burdens caused by the development once you start departing from the actual trips that the project is generating. Michael Woodward: And the reason was... Michael Davies: Are you questioning whether the nexus is actually demonstrated in the document? Are you actually saying that no the nexus is... Michael Woodward: No. I'm just questioning whether the nexus that has been put forward justifies that particular fee. We are not saying that there's some nexus although we question that, with respect to the additional parking and the 10% non-refundable, in the version of the Specific Plan dated October 24, 1989 on page 95, they explain in the text there, apparently why you've gone to this square footage based fee. And that is in order to encourage land uses such as hospitals, medical office, etc. which contribute to a diversified employment but generate more trips on a square footage basis. For that reason, you went to an average figure which has a disproportionate effect on larger projects. On page 96, the non-refundable fee is addressed as being a disincentive to developers who might want to unrealistically accelerate their project applications to earlier stages in the Plan. So, there's really no relationship at all. It's just a bit of a possible penalty.

Response: The rational nexus for total transportation fees has been demonstrated through the estimation of the total number of added trips and the total costs of transportation improvements (DEIR, p.195, footnote). The comment regards the 10% non-refundable fee provision of the preliminary ordinance and the use of per-square-foot fee rates in place of per-trip rates, and whether a nexus for such fee structures exists. The non-refundable fee, as well as providing a disincentive to discourage developers from unrealistically accelerating early project applications, covers the costs of such speculative projects, which will not result in additional fees later to cover early efforts to program transportation facilities and programs. The ordinance has been modified to provide for the refund of the 10% should a Building Permit not be obtained within 2 years of project plan approval. The average per-square-foot fees provide incentives for development of neighborhood retail uses and other diversifications of land uses which serve to reduce regional trip making needs and therefore reduce demand for transportation improvements.

Comment 62.d: The other point I wanted to bring up was with respect to providing replacement residential housing. On page 35, the requirement requires that such housing be provided, that the building permits and C of O's for such housing be provided at the same time or prior to the building permits and C of O's for your development. As Jeff Allen indicated, for the Watt project, the requirement was only that that housing be completed prior to the final occupancy of their first building. We think the same flexibility. . . Michael Davies: Is that what the final Development Rights Agreement says? Michael Woodward: Eh. . . yes. That's what the. . . well, as I understand it,

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that's what one of the conditions of the project permit for their project says and the Development Rights Agreement guarantees that they're going to do it in connection with their project permit. So, that type of flexibility or something along those lines where there is some time, would take account of the realities of getting financing, getting entitlements for the replacement housing sites and constructing them.

Response: The requirements stated in the draft Ordinance shall be implemented in the interest of satisfying the plan goal to "Build housing and commercial at the same time" (DEIR, p. 29).

Comment 62.e: And finally, the final point I'd like to touch on deals with Map 6 in the Specific Plan Ordinance following page 22 and that's the public facilities zoned freeway right-of-way property which has been spoken of earlier. Now, those areas are currently classified in district 1 and they have a maximum FAR of 1.5 to 1 and they've also been pound signed and now, what the Plan is proposing is to basically triple the FAR on those properties. In the Specific Plan, in the Ordinance and even in the EIR, there's absolutely no justification for that. I can find no discussion of it the land use section of the EIR. It seems it would put the whole Plan in jeopardy if you proceed without addressing that. As Dan indicated, large development on these freeway rights-of-way would be inappropriate in these locations and my question how consistent the proposal as it's currently drafted and currently put forward would be with the General Plan. In fact, I don't even believe the General Plan amendments that are proposed cover this. As Dan said, we'll be sending a letter giving some more technical details to our comments. Thank you.

Response: The development intensities on freeway right-of-way properties was included within the total CCW Specific Plan permitted square footage analyzed throughout the DEIR, and as such has been included in the proposed Specific Plan Ordinance.

Mary Staffa, General Manager, Downtown News.

Comment 62.f: We are located at 1264 W. 1st Street within the Specific Plan area. I'm here representing Downtown News as a property owner not as a newspaper. For several years we tried to find a way to be supportive of the development plans for the area downtown west of the Harbor Freeway. After all, we own land, we're a tenant and our self interest would best be served if the vacant lots which dominate the area were built up. We would like nothing better than to see the economic vitality that might result in lessening the graffiti and vandalism which plague the neighborhood. However, we find at least 4 major deficiencies in the City West Plan. These flaws are of the magnitude that make approving the EIR and/or the Plan a mistake for the city. The City West Specific Plan is a good idea run amuck. It began with the still noble intention of stopping bad development in City West. The other goal was to find a way to fund infrastructure improvements that would allow further development. As we say, there are 4 major deficiencies in the consulting recommendations as they now stand and briefly they are:

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First, 40% of the transportation dollars have not been identified and they will, very probably, never exist. Secondly, there is no fall back position if the Plan cannot be evolved as articulated. Third, the proposed development will further bleed the urban core of economic vitality. Fourth, and most importantly, the Plan flies in the face of massive public investments already being made in transportation improvements. Ones that have not yet been fully utilized. They are metro rail, Long Beach light rail, Pasadena light rail and the acquisition of Exposition Blvd. right-of-way. City West is not accessed by any of these transportation improvements. It doesn't make sense to pull new office development away from that potential access. At least it won't for the next 20 or 30 years. On the problem of new transportation funding, the architects of the Plan are hoping that the \$600 million dollars needed will come from both the Community Redevelopment Agency and from a measure on the June ballot called SCA-1. The money from CRA is, in all likelihood, a pipedream. The strong indications are that most money coming to the CRA will be spent on low income housing and other social services. Money for transportation improvements will be either non-existent or minuscule. The SCA-1 money absolutely cannot be depended upon. It would mean (1) the voters would have to approve the measure which raises the gas tax 9 cents per gallon; (2) Caltrans would have to make the project a priority; and (3) Los Angeles would have to qualify for the program which is no mean feat.

Couldn't we, for instance, diminish the need for transportation improvements if we authorized residential developments rather than commercial. Instead of 25 million sq.feet of new office development, how about 5 or so. How about zoning the area for a huge residential community with even more incentives to get it built. Then the area could become a real boon to the urban core instead of threatening it. The only transportation improvements needed would be a larger DASH system. Thank you.

Response: The alternative to the proposed Specific Plan recommended in the comment has been analyzed in the DEIR (pages 401-411). This alternative proposes 5 MSF office space and the remainder of the project's built form to be built as residential resulting in 32,000 dwelling units. However, the analysis in the DEIR indicates that such an approach would not be feasible due to the lack of market for so much housing and due to the lack of total developer fees that such a proposal would collect. Insufficient developer fees would hinder implementation of needed transportation improvements.

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63. **Commentors:** Individuals Testifying at
Public Hearing Regarding the Specific Plan and DEIR

April 19, 1990

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Lou Bedola, Deputy District Director, Caltrans District 07.

Comment 63.a: The plan positions that Central City West is a local issue when in fact it must be considered in the context of the development of all of downtown Los Angeles. The question is not will the Central City West transportation plan mitigate the impacts of Central City West related traffic but how does the mitigation fit with what is needed to accommodate the traffic related to continuing downtown development over the next twenty years. What is needed for lack of a better term this afternoon is a blueprint. This blueprint should address access to the downtown area from all directions and based on proposed developments. The future of downtown demands a look at proposed growth to the year 2010, not a piecemeal approach based on individual development. The latter approach has resulted in unprecedented traffic congestion on downtown streets and freeways. The blueprint approach must involve all interested agencies and parties and the time to begin is now. To paraphrase the late Robert Kennedy, "If not us, who, if not now, when". Now Caltrans is pleased to be part of an informal team which is developing the long range circulation access objectives for the Los Angeles greater downtown area. Since the beginning of the year, representatives of Caltrans the Los Angeles Departments of Transportation and City Planning, the Los Angeles Community Redevelopment Agency, the Los Angeles Central City Association, Center City West Associates, DKS Associates, Linscott Law and Greenspan Associates and A.C. Martin Associates have been meeting and have defined a preliminary sketch of these long range objectives.

Response: The commentor is correct to point out that the Central City West plan must be evaluated in the context of overall downtown development. The plan was developed not only with CBD growth through the year 2010, but regional growth as well, and the DEIR traffic analysis reflected the impacts of downtown development. The specific plan includes contributions toward several improvements (eg: widening of the Hollywood Freeway to Vermont, improvements to the Santa Monica Freeway at Hoover-Union, improvements to the Golden State-Pasadena Freeway connectors, and to Alameda Street, as well as regional transitway extensions) all of which will help to mitigate not only CCW traffic impacts but CBD impacts as well. The CCW specific plan was developed for the express reason noted in this comment; to avoid "a piecemeal approach based on individual development". The discussions that have occurred between CCWA, its consultants, the City and Caltrans have been geared toward developing a comprehensive access improvement plan for the greater CBD and toward ensuring that improvements included in the CCW plan are consistent with such a long-range access plan and do not preclude implementation of any of its features. The CCW Specific plan has been modified to incorporate Caltrans feedback (eg: The Harbor Freeway Transitway has been relocated to the west side of the freeway to avoid any potential conflict with a future through traffic improvement project on the Harbor Freeway) and suggestions.

Comment 63.b: We have equated growth potential to specific improvements. For today's testimony I will refer to these long range objectives as a preliminary blueprint to address access to greater downtown Los Angeles. The blueprint which I speak of has been attached to our written testimony. The following strategies represent the basic components of the blueprint for downtown Los Angeles. Complete the proposition A transit system serving downtown Los Angeles providing reasonable bypasses to route traffic around the congested downtown freeway system. Provide opportunities and incentives for east and west bound Central City traffic to exit the freeway system prior to Harbor Freeway. To provide additional surface street links to the Regional system. To provide additional surface street capacity for access to and from the Central City. To provide incentives to use telecommuting, ride sharing and mass transit and finally to reduce total vehicle trips in the region and to and from the Central City. As to the specifics of the Central City West plan there are several improvements which we support, such as the improvement of the Glendale Blvd. interchange with the Hollywood Freeway extending the Harbor Freeway transit way to 7th street, widening of the Hollywood Freeway from Vermont Avenue to the four level interchange and the downtown regional bypasses. A proposal in the Central City West plan is to reconstruct many of the existing ramps between 3rd Street and Olympic Street on the Harbor Freeway. Due to a limited window of opportunity for construction approximately six hours each night, this construction will be very disruptive to traffic and difficult implement. Of more significance the Freeway is heavily congested and can tolerate no additional traffic without the improvements identified in the blueprint. A bypass of the Harbor Freeway relieving it of the through regional trips may enhance the feasibility of providing ramp services to the West side as proposed in the Central City West Plan. It would be desireable, however, to intercept the traffic from the West before it reaches the downtown segment of the Freeway. This could be accomplished by providing and improving some North/South arterials and improving access to the Santa Monica Freeway.

Response: The CCW plan has been designed to intercept CCW-bound traffic west of the Harbor Freeway where possible. The plan proposes an improvement on the Santa Monica Freeway at Hoover-Union to facilitate the use of Union Ave. as a route to/from CCW. Similarly, the proposed improvements on the Hollywood Freeway at Glendale Blvd. and Beaudry Ave. have been designed to encourage CCW traffic to utilize Glendale and Beaudry for access to the Hollywood Freeway, rather than the Harbor Freeway. The CCW plan does not preclude development of a bypass of the Harbor Freeway designed to relieve it of regional through trips. Planning, design and construction of such a regionally significant improvement should be pursued cooperatively by regional, state and local agencies. With regard to construction impacts on the Harbor Freeway resulting from CCW-proposed ramp improvements, detailed construction management plans will be required as part of the engineering design packages for these improvements. Such plans will be subject to Caltrans review and approval.

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Comment 63.c: What is lacking in the plan is a proposal for a major transportation facility to relieve the Harbor Freeway and provide direct access to destination west of the Harbor Freeway. Many who take the Hollywood Freeway eastbound to the southbound Harbor Freeway actually have destinations well west of the Harbor Freeway and need not be on it at all. We must provide the alternative to keep these people off the Harbor Freeway. This is what we call a west side bypass. Ideally this would be a facility extending from the present terminus of the Glendale freeway to the Santa Monica freeway. It could be a super street, an expressway, a transit way or a freeway. It needs to be looked at. Also additional capacity on the Harbor and Hollywood freeways is needed to further enhance the diversion of regional trips. This would free up capacity on these two freeways for local trips bound for the CBD.

Response: As noted in response to Comment 63.b above, the CCW plan does provide improvements designed to improve access to the CCW area west of the Harbor Freeway that will intercept this traffic before it reaches the Harbor Freeway. The CCW plan also provides the groundwork for a transitway connection to the Glendale Freeway by extending the Harbor Freeway Transitway through the CCW area to the Hollywood Freeway. North of the Hollywood Freeway, the City of Los Angeles and Caltrans will need to continue discussions with community groups to develop an environmentally sensitive acceptable transit connection. The CCW plan assumes the use of existing lanes on Glendale Blvd. for HOV's and transit vehicles. Additional alternatives for a west side bypass, further to the west of the CCW area, should be pursued in the context of the blueprint for CBD access that Caltrans, the City of Los Angeles and other public and private entities have initiated. Such alternatives would be outside of the CCW area and therefore beyond the ability of CCW property owners to implement.

Comment 63.d: The plan's basic analysis focuses on a one peak hour, and a supposition that spreading the peak could reduce peak hour traffic by 10%. The peak has already spread 3+ hours in the morning and 4+ hours in the evening. There is very little potential for additional spreading.

Response: The analysis included in the specific plan assumed that ten percent of the theoretically forecast peak hour demand would shift to alternate hours. As pointed out by Caltrans staff, in the past 10 to 15 years many people have adjusted their work hours to avoid commuting during peak hours. As the demand for travel further increases over the next 20 years, the public will be forced to make further adjustments in their travel habits; shifting to alternate times or modes of travel (e.g. ridesharing or transit). It is correct to point out that the demand for travel on the freeways exceeds capacity, yet the volume of cars on the freeway cannot exceed capacity. This is similar to water in a pipeline; when it's full, it overflows. The

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specific plan analysis was designed to reflect this phenomenon. Rather than forecasting unachievable traffic volumes in excess of capacity, the traffic analysis forecasts what is more likely to be the reality of future conditions; freeways at capacity during the peak hour with commuters being forced to shift to alternate time periods, modes or routes of travel.

Comment 63.e: The plan also postulated a 10% reduction in through (regional) trips by such strategies as flex time and a better jobs-housing balance. However, strategies such as these only address home-to-work trips which are only about 20% of the region's vehicle trips and 25% of the total miles travelled. Thus, the strategies to reduce home-to-work trips by 10% will only result in a 2.5% reduction in regional vehicle miles traveled. Non-home-to-work trips will not be affected by such strategies.

Response: The comment is correct, but it should be noted that the specific plan analysis did apply the ten percent reduction in through trips only that portion of the trips on the freeway system passing by downtown during the peak hour. The majority of the trips on the freeways near downtown during peak hours in the year 2010 can be expected to be home-work trips, as non-home to work trips are forced out of the CBD area during the peak commute times.

Comment 63.f: Based on City of Los Angeles CBD cordon counts, and Caltrans freeway occupancy counts, trends indicate that vehicle occupancy rates have been slightly down except during the gasoline shortages of the late 1970s. Admittedly, this trend could be reversed, especially as SCAQMD Regulation XV takes effect.

Response: Regulation XV and other transportation demand management strategies and ordinances are largely aimed at home-to-work trips. As noted in the response to Comment 63.e, most of the trips on the freeway system around downtown during the peak hour in the year 2010 can be expected to be work-related commute trips. Therefore, it does not seem unreasonable to assume that vehicle occupancy will increase in the future with major infrastructure improvements such as the El Monte Busway and Harbor Freeway resulting in a ten percent reduction in peak hour trips.

Comment 63.g: Realistically, the demand management strategies cited in the transportation plan may result in a total trip reduction, in our opinion, of approximately 10%, not the 35% cited in the plan. The latent (unfulfilled) demand will use the freeways during the peak; peak congestion at best may be reduced from 4 to 3 hours.

Response: The technical documents prepared as background for the Specific Plan demonstrate that the trip reduction estimates included in the transportation analysis are reasonable as explained on the three previous responses. Caltrans is correct to note, and the CCW analysis has confirmed,

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that latent demand for travel or the freeway system around the CBD will always keep the freeways at capacity during the peak hour.

Comment 63.h: Now as you are all aware, Caltrans is in the transportation business. However, relative to the land entitlement issues, Caltrans is also a major land owner in the Central City West area. Thus far, we are pleased with our progress that we made in our discussions with city staff on these issues. We have reviewed the plan and the relevant sections of the draft ordinance and are working with city planning staff on these land entitlement issues. We see a strong linkage between transportation issues and land entitlement issues. We are submitting written testimony which elaborates on our position on land entitlement concerns. In closing we appreciate the work done by the city on this plan and we look forward to continuing our cooperation as we move to closure on these issues regarding property and transportation improvements in the Central City West area.

Response: Comment acknowledged.

Karen Z. Hite, Southern California Rapid Transit District (SCRTD).

Comment 63.i: We are encouraged by the Harbor Transit Mall as an alternative and would like to very much to see that presented as an alternative to the transit tunnel in the plan. We believe that the tunnel will allow and facilitate east/west movements from the transit bus movements both regional buses and the Dart system and that it will encourage the use of transit by providing easily accessible environment.

Response: The at-grade Transit Mall along Bixel Street is now being proposed in the Specific Plan in place of the previously proposed transit tunnel.

Comment 63.j: The other improvement that we had some problems with was the addition of the Metro Redline Station at Bixel Street. There are no engineering facilities built into the tunnel at that point and we feel that operationally to retrofit the tunnel with the station afterwards will create more problems than it is worth. We feel that the plan grossly underestimated the cost of building a station at that level and that the disruption to the service will be a blow we will feel is not worthy of the system. We also see the station as being a local benefit and not having as much regional benefit as the plan seems to indicate. As an alternative we have suggested and have been doing some investigation into the use of an automated guideway system or an automated transit system whether a monorail or a cable driven system as an alternative. We envision that this system would go basically from the Fourth and Hill Metrorail Station using the Bunker Hill Transit Tunnel and connect to the Seventh and Flower Station. We would like to see some sort of accommodation for a right of way for a system of this sort put into the plan or at least considered as an option. The District recognizes the need to keep the plan adoption on

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course and therefore we're offering these suggestions as alternatives and not as preferred improvements because we have no desire to slow down what's begun. We are suggesting that further study be initiated.

Response: See response to Comment 2.f.

Sophia Lewis, 1565 El Tibo Way.

Comment 63.k: I'm not an architect and I'm not an engineer, but I am concerned about my health, my childrens' health and my grandchildrens' health. I would like to see that there should be no cars at all going into downtown. I think that the Diversified Mass Transit System is fine, but I think we should absolutely disallow any individual drivers to come into downtown because it's a very small area and if you ever watch the traffic on Glendale Boulevard or Echo Park or through Elysian Park in the early mornings or afternoons you will think it's a freeway. And so I think when you plan on having mass transportation, please take into consideration to avoid having people coming in their own cars. I know we all have a love affair with our cars and I love my BMW, but I'd be willing to leave it at home if we had a mass transportation system. Thank you.

Response: The proposed Specific Plan makes intensive investments into public transportation infrastructure and into emphasis on TDM programs to ensure demand for these facilities. Nevertheless, system capacity and shifts in mode of demand cannot justify a ban on automobiles downtown.

IV. MITIGATION MONITORING PROGRAM

INTRODUCTION

The California Environmental Quality Act (CEQA) requires the adoption of programs to monitor the implementation of mitigation measures imposed upon projects. The Public Resources Code states that "... the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment."⁵ The intent of these provisions is to ensure that mitigation measures are carried out. The public agency must adopt the monitoring and reporting program when approving a project; in this case, the project is the Central City West Specific Plan.

The following Central City West monitoring and reporting program consists of a short discussion of the program components and presents information on the method for ensuring compliance with or implementation of the adopted mitigation measures. Though the mitigation monitoring provisions of CEQA apply only to impacts which would be significant if not mitigated, the program has been developed to address all proposed mitigation.

PROGRAM DESCRIPTION

The Central City West monitoring and reporting program has two primary objectives: (1) to establish a framework for the manner in which each measure will be monitored, and (2) to establish a reporting process to inform the public and decision-makers of the status of the overall program. The program will be managed by the Program Coordinator, who is responsible for how the overall program is conducted. Agency Representatives will be responsible for verifying that measures are applied. Annual reports will be prepared to document the progress of the program and to establish a consistent form of reporting the program status.

⁵ State of California. *CEQA - Mitigation Monitoring*. Public Resources Code, Section 21081.6. Adopted as AB3180 (Cortese), September 23, 1988.

IV. Mitigation Monitoring Program

MONITORING COMPONENT

Monitoring refers to the process of overseeing how a measure is implemented. This oversight function ensures that the mitigation measures are carried out as approved and that their implementation is adequately documented. The Project Applicant implements the mitigation measures after receiving clearance from the appropriate Agency Representative. Monitoring is accomplished by the Program Coordinator and the Agency Representatives. The roles and responsibilities of these key players are outlined below:

- **Program Coordinator.** The City Planning Director (or designee) will be the overall Program Coordinator responsible for ensuring that department approvals (see below) are obtained at the correct stage in the development of the project and to verify that all necessary approvals are obtained before a particular phase of the project begins. The Program Coordinator should make periodic area visits to ensure that all mitigation measures are operational as planned and designed and to document the progress of Specific Plan mitigation.

The Program Coordinator will also be responsible for resolving differences of opinion among Agency Representatives. The Program Coordinator should investigate any non-compliance situation or complaint, and may suspend any operation which violates a mitigation measure.

An on-going log will be maintained by the Program Coordinator (or designee) to explain changes to the status of measures, and thereby, to document compliance; compliance with the measures should be supported by a brief narrative.

- **Agency Representative.** Agency Representatives will be responsible for verifying compliance with those mitigation measures within their permit authority or area of expertise. Compliance will be tracked through the use of the log identified under Project Coordinator, above.

REPORTING COMPONENT

The reporting component requires documentation and public disclosure of the status of the program. Since the purpose of the reporting component is to provide information to the public and decision-makers, the Program Coordinator will prepare a yearly comprehensive status report. This report shall consist of the log of the status of adopted mitigation measures to date and the information derived by the Program Coordinator from periodic communications with Agency Representatives. The yearly report shall be submitted to the Planning Commission as an information item. Upon request, all reports generated by this program shall be available for public review.

PROGRAM IMPLEMENTATION

Implementation of the adopted mitigation measures will occur in three different stages: prior to Specific Plan ordinance adoption, prior to individual project approval, and continuing (on-going mitigation). The description of these stages follows:

- Prior to Specific Plan Ordinance adoption: This refers to those adopted mitigation measures that are implemented through the inclusion of language in the proposed Central City West Specific Plan Ordinance. These measures will be easily verified by the Program Coordinator through an analysis of the Specific Plan Ordinance upon adoption.
- Prior to individual project approval: This refers to those adopted mitigation measures that must be completed and verified prior to the issuance of a Building Permit or Certificate of Occupancy for an individual land use development project. Usually this particular measure is verified by the agency responsible for requiring the condition or mitigation measure.
- Continuing Measures: On-going or post-adoption measures refer to those adopted mitigation measures which will be monitored for an extended period of time, generally on an annual progress reporting basis.

To facilitate the implementation of the adopted mitigation measures, the timing - when a measure will be carried out, the responsible party - who is responsible for verifying compliance with a measure, and implementation - how measures will be implemented, have been identified for each of the adopted mitigation measures, and are detailed in Table S-2 in Section I of this document.

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